

**To:** [Ex. 7]@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** [Ex. 7]@vw.com]  
**From:** CN=Linc Wehrly/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/19/2011 5:00:09 PM  
**Subject:** Re: Volkswagen/Audi Visit

**Ex. 7**

That would be fine. That date works for me. Please work to Jim to schedule a time.

Jim - please invite Chris and Rob as well.

Thanks,  
Linc

**From:** [Ex. 7]@vw.com]  
**Sent:** 08/19/2011 11:26 AM AST  
**To:** Linc Wehrly; Jim Snyder  
**Cc:** [Ex. 7]  
**Subject:** Volkswagen/Audi Visit

Hello Linc and Jim:

I am writing to inquire about the availability of EPA staff to meet with representatives from VW and Audi on Thursday, September 29, 2011.

We have some folks visiting the US for a number of meetings, and would like to use the opportunity to discuss some topics with EPA. Our proposal is to meet with EPA staff in the morning of the 29th to discuss Tier 3 topics. These arrangements are being made separately.

I am interested in setting up a meeting in the afternoon on the 29th to discuss PHEV fuel economy and labeling, and other certification/emission testing topics. We would like about 2 hours in the afternoon.

Please let me know if this fits your schedules. I would appreciate it if your could suggest/invite other EPA staff as appropriate.

Best regards,

**Ex. 7**

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**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7**@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 8/22/2011 12:07:17 PM  
**Subject:** RE: VW Group - Bentley Mulsanne Application  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Our Accounting Dept. shows the electronic payment made today 08-22-11. I'm not sure why the delay but you should see it soon in your system.

Regards,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, August 18, 2011 12:59 PM  
To: Rodgers, William  
Cc: Giles, Michael; Hart, Robert (VWoA); VandenBroek.Willem@epamail.epa.gov  
Subject: Re: VW Group - Bentley Mulsanne Application

Hi Bill, I have to [Ex. 6] but I've been looking through the cert app. Looks okay so far except that the fee payment isn't in our database yet. I see by the form that it was submitted 8/10 so its probably not thru the system yet.

I'm off tomorrow but I'll leave a copy of the fee form with Bill in case they was a problem with the checking labeling .

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>  
Date: 08/17/2011 10:56 AM  
Subject: VW Group - Bentley Mulsanne Application

Hello Jim,  
Just a heads up, I submitted a certification request and application for the Bentley test group CBEXV06.84LA. This is a carryover test group from 2011 with no changes. All of the Verify release 8 changes in Section 7 of the application have been satisfied with no place holders necessary.  
We have been delayed getting this application submitted due to OBD discussions (see Sec.16 OBD approval letter) so scheduled SOP is rather soon. Any effort you can make to prioritize this Certificate would be appreciated.

Please let me know if you have any questions.

Regards,  
Bill Rodgers  
VWGoA

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Tue 8/23/2011 2:00:52 PM  
**Subject:** VW Group - regenerative braking question

Hello Jim,

Please disregard my question about the regenerative braking - there was simply some confusion with our colleagues.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 8/24/2011 11:04:26 AM  
**Subject:** FW: Confirmation of Certification Fees Payment

Hi Jim,  
Just to let you know, we received the confirmation of payment related to the pending Bentley certificate.

Bill

-----Original Message-----

From: Thomas, Richard (EEO)  
Sent: Tuesday, August 23, 2011 3:02 PM  
To: Rodgers, William  
Subject: FW: Confirmation of Certification Fees Payment

-----Original Message-----

From: fees@epa.gov [mailto:fees@epa.gov]  
Sent: Tuesday, August 23, 2011 2:40 PM  
To: Thomas, Richard (EEO)  
Subject: Confirmation of Certification Fees Payment

To the representative for Bentley Motors Ltd.:

Your certification Fee Filing Form(s) submitted for the following engine family or test group(s) and the associated financial documentation for your payment of \$33974.00 were received on 08/23/2011.

- CBEXV06.84LA

This message indicates only that EPA has received record of your payment of the above certification fee. It does not constitute the granting of a Certificate of Conformity by EPA or convey any information about the status of your certification application for the subject engine family or test group(s).

Please do not respond to this email. If you have any questions regarding certification of the engine family or test group(s), please contact your EPA Certification Representative.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 8/29/2011 2:15:30 PM  
**Subject:** Decision Information - Audi Q5 Hybrid  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted a decision information file to Verify for the 2012 Audi Q5 (gasoline/electric) Hybrid. Note that it is an AWD configuration tested on a 4-wheel drive dyno.

I have marked it as new technology because it's the first 4-cylinder hybrid for the VW Group and there are some hardware and software differences between the Audi hybrid and the existing VW hybrid designs. The biggest difference being that Audi uses a integral electric drive unit in the transmission, while VW uses a separate drive unit sandwiched between the engine and transmission. Please let me know if you have any further question about the vehicle.

Regards,

Bill Rodgers

Engineering and Environmental Office

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 8/29/2011 5:39:09 PM  
**Subject:** FW: Decision Information - Audi Q5 Hybrid  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

I received your call but can't seem to call out to return it.

I added the missing 3 Evap tests you mentioned. I submitted the tests but just plain forgot to include them in the DI.

I would also like to discuss upcoming 2012 model year Application Updates with you, so when you have a minute give me a call.

Thanks,

Bill

From: Rodgers, William  
Sent: Monday, August 29, 2011 10:16 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Cc: Giles, Michael; Hart, Robert (VWoA)  
Subject: Decision Information - Audi Q5 Hybrid

Hello Jim,

I submitted a decision information file to Verify for the 2012 Audi Q5 (gasoline/electric) Hybrid. Note that it is an AWD configuration tested on a 4-wheel drive dyno.

I have marked it as new technology because it's the first 4-cylinder hybrid for the VW Group and there are some hardware and software differences between the Audi hybrid and the existing VW hybrid designs. The biggest difference being that Audi uses a integral electric drive unit in the transmission, while VW uses a separate drive unit sandwiched between the engine and transmission. Please let me know if you have any further question about the vehicle.

Regards,

Bill Rodgers

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 8/29/2011 6:10:51 PM  
**Subject:** RE: FW: Decision Information - Audi Q5 Hybrid  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

Good catch. It looks like the shed data didn't get added to the test input xml for some reason. We should have it fixed today.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, August 29, 2011 1:53 PM  
To: Rodgers, William  
Subject: Re: FW: Decision Information - Audi Q5 Hybrid

Bill, I see the additional FTP exhaust tests but I still don't see any evaporative test results

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/29/2011 01:39 PM  
Subject: FW: Decision Information - Audi Q5 Hybrid



Jim,

I received your call but can't seem to call out to return it.

I added the missing 3 Evap tests you mentioned. I submitted the tests but just plain forgot to include them in the DI.

I would also like to discuss upcoming 2012 model year Application Updates with you, so when you have a minute give me a call.

Thanks,

Bill

From: Rodgers, William

Sent: Monday, August 29, 2011 10:16 AM

To: 'Snyder.Jim@epamail.epa.gov'

Cc: Giles, Michael; Hart, Robert (VWoA)

Subject: Decision Information - Audi Q5 Hybrid

Hello Jim,

I submitted a decision information file to Verify for the 2012 Audi Q5 (gasoline/electric) Hybrid. Note that it is an AWD configuration tested on a 4-wheel drive dyno.

I have marked it as new technology because it's the first 4-cylinder hybrid for the VW Group and there are some hardware and software differences between the Audi hybrid and the existing VW hybrid designs. The biggest difference being that Audi uses a integral electric drive unit in the transmission, while VW uses a separate drive unit sandwiched between the engine and transmission. Please let me know if you have any further question about the vehicle.

Regards,

Bill Rodgers

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william.rodgers@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 8/31/2011 5:53:21 PM  
**Subject:** VW Group VID-CHUB-Q5A Supplemental Information  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

As a heads up, I uploaded the Supplemental information for the Audi Q5 Hybrid, VID: CHUB-Q5A.

I'm not sure if you intend to measure particulate matter so I included the standards information just in case.

Regards,

Bill Rodgers

Engineering and Environmental Office

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(o\\_l\_/o)

**To:** richard.thomas@vw.com[]  
**Cc:** christoph.kohnen@vw.com;CN=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Jim  
Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]; N=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/1/2011 12:57:07 PM  
**Subject:** VW/Audi Group 2010 CAFE Report

Richard,

Please email me a copy of the VW 2010 passenger car and light truck CAFE model year report(s), and enter them into the EPA Verify data base when you get a chance. When entering the document(s) into Verify, please enter them in the Verify document module under the 2010 model year and with a Compliance Document Type of "CAFE Model Year Report."

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Thur 9/1/2011 2:27:01 PM  
**Subject:** VW Group - Decision Information for Golf R

Hello Jim,

Today we submitted a decision information request for the Golf R, which is a new carline being added to Audi test group CADXJ02.03UA and evap family CADXR0110238.

Note, this vehicle is AWD and will be sold with manual transmission only. There is no new technology being introduced with this carline.

Note, we have also submitted a running change letter and revised initial application for this carline addition. We will need a revised certificate (the current certificate number is CADXJ02.03UA-002-R01).

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 9/6/2011 2:06:38 PM  
**Subject:** VW Group - Conditional Certificate Request  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted a Certification Request for the Audi Q5 2.0L Hybrid test group: CADXT02.0HUB. As a reminder this vehicle is scheduled for EPA testing on Nov. 2nd , therefore, we are requesting that a conditional certificate be issued.

Regards,

Bill Rodgers

Engineering and Environmental Office

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(248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Tue 9/6/2011 2:58:05 PM  
**Subject:** VW Group - New Certificate Request for CADXJ02.03UA / CADXR0110238

Hello Jim,

I hope you had a great Labor day weekend.

Just to let you know, this morning I submitted a new certificate request for Audi Test Group CADXJ02.03UA / Evap Family CADXR0110238 related to the addition of Golf R carline.

Also, on a related note if you could let us know the status of the decision for confirmatory testing for this vehicle it would be great.

Thanks,

Mike

From: Giles, Michael  
Sent: Thursday, September 01, 2011 10:27 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Cc: Rodgers, William; Hart, Robert (VWoA)  
Subject: VW Group - Decision Information for Golf R

Hello Jim,

Today we submitted a decision information request for the Golf R, which is a new carline being added to Audi test group CADXJ02.03UA and evap family CADXR0110238.

Note, this vehicle is AWD and will be sold with manual transmission only. There is no new technology being introduced with this carline.

Note, we have also submitted a running change letter and revised initial application for this carline addition. We will need a revised certificate (the current certificate number is CADXJ02.03UA-002-R01).

Regards,

Mike

Michael Giles

Certification Specialist

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3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 9/7/2011 8:07:53 PM  
**Subject:** VW Group - Bentley Running Change  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted (1) a Running Change "CBI\_CBEXV06.0501\_APP\_C01\_R00.PDF", (2) a revised Application and (3) a Certificate Request to add a Carline, Continental GTC, to the Bentley test group CBEXV06.0501. No new tests were performed for this carline because they were already carried over from 2011 and used as the worst case tests for the 2012 test group.

An additional correction was made to the Application Section 7 CSI to include the E85 tests previously confirmed by EPA and absent from the previous submission. The Verify release 8 changes were also included in this update.

Let me know if you have any questions.

Thanks,

Bill Rodgers

Engineering and Environmental Office

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** [Ex. 7]@vw.com; [Ex. 7]  
[Ex. 7]@vw.com; [Ex. 7]@vw.com  
**From:** [Ex. 7]  
**Sent:** Fri 9/9/2011 1:53:03 PM  
**Subject:** VW Group - discussion feedback

Hello Jim,

Just a quick follow up on our discussion today regarding the number of test groups with similar concepts. I discussed this with our group and in general, the breakdowns are determined by the following factors:

- 1) Factory or development group (VWX or ADX), subject to the negotiations between these groups.
- 2) Emissions standard
- 3) "Grouping Statistic" criteria
- 4) Internal rational – for example whereas a PZEV Bin 3 might possibly be combined with a SULEV Bin 3, the factories could prefer distinct test groups for clarity.

Finally, Bill Rodgers mentioned that he is in the process preparing the MY 13 certification list you asked about.

Please let me know if you have any other questions.

Regards

**Ex. 7**

**Ex. 7**

Certification Specialist

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** [REDACTED] Ex. 7  
**Sent:** Tue 9/13/2011 2:49:35 PM  
**Subject:** Accepted: Mtg with VW Audi: PHEV fuel economy, labeling and misc certification

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 9/14/2011 11:13:10 AM  
**Subject:** RE: VW Group - Conditional Certificate Request  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks Jim,

What did we do before computers?

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, September 13, 2011 6:43 PM  
To: Snyder.Jim@epamail.epa.gov  
Cc: Rodgers, William  
Subject: Re: VW Group - Conditional Certificate Request

Spoke to soon. I tried something different just now and it approved it without the error message.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: Jim Snyder/AA/USEPA/US  
To: "Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
Date: 09/13/2011 06:25 PM  
Subject: Re: VW Group - Conditional Certificate Request

Bill, just to let you know, I've tried to approve this last week but got an error code back. I've been working with the help desk but not resolved yet. It may have something to do with the conditional. It says "N" in a box for the cert details and when I change it to "Y" for Conditional, it won't save it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 09/06/2011 10:07 AM  
Subject: VW Group - Conditional Certificate Request

Hello Jim,  
I submitted a Certification Request for the Audi Q5 2.0L Hybrid test group: CADXT02.0HUB. As a reminder this vehicle is scheduled for EPA testing on Nov. 2nd, therefore, we are requesting that a conditional certificate be issued.

Regards,

Bill Rodgers  
Engineering and Environmental Office

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william.rodgers@vw.com

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**To:** Jim Snyder/AA/USEPA/US@EPA;David Good/AA/USEPA/US@EPA[]; avid Good/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Fri 9/16/2011 3:55:49 PM  
**Subject:** Interpretation of In-Use GHG Provisions  
[GHG In Use Test Provisions.pdf](#)

Hello Jim and Dave:

This question may have come up before, but I am unable to find the answer and I have an urgent request for information.

In EPA's September 23, 2010 GHG presentation, there are a couple of slides that address in-use GHG requirements. I have attached these for reference.

My basic question is, on Slide 65 what exactly is meant by the parenthetical note "full useful life only" following the bullets for In-use CREE standard and In-Use N2O & CH4 standards?

Is this simply a reference that the CREE, N2O and CH4 standards are full useful life standards and vehicle results from IUVP testing are compared to the full useful life standards at the low-mileage and high-mileage test points?

A simple explanation of the in-use test requirements for CREE, N2O and CH4 would be appreciated (i.e., what testing is required at each of the low-mileage and high-mileage test points and the applicable standard).

Thanks, and best regards,

**Ex. 7**

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**Ex. 7**



Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7**@vw.com

# In-Use GHG Standards

86.1818(d); 86.1818(f); preamble 25421-24, 25476-77

- In-use CREE standard (full useful life only):
  - Based on actual vehicle (carline/subconfiguration) tested by the manufacturer/EPA and included in manufacturer's final model year report
    - Including data substitution, engine code equivalency, and analytically derived data
  - In-use CREE standard = combined (55% city/45% hwy) CREE value of the tested vehicle multiplied by 1.1
  - If the in-use vehicle (carline/subconfiguration) was not tested, the in-use standard defaults to model type combined CREE value multiplied by 1.1
  - For multi-fuel vehicles, must determine in-use CREE standards for each fuel
  - If manufacturer chooses to include  $N_2O$  &  $CH_4$  in the **optional CREE (OCREE)** equation of 86.1818 (f)(2), in-use standards & compliance are based on the OCREE equation.
- In-use  $N_2O$  &  $CH_4$  standards (full useful life only):
  - Depend on  $N_2O$  &  $CH_4$  methodology selected for compliance in 86.1818(f):
    - If Cap standards were selected, in-use  $N_2O$  &  $CH_4$  are the certification standards (no multiplier)
    - If  $N_2O$  &  $CH_4$  emissions are included in the OCREE equation under 86.1818(f)(2), there are no in-use  $N_2O$  &  $CH_4$  standards for that carline/subconfiguration.
- Apply to manufacturer's IUVP testing and EPA in-use testing

# In-Use Testing

86.1818(f), 86.1845(b)(5)(i) & (c)(5)(i); preamble 25474-76,

- In-Use Verification Program (IUVP) Requirements
  - Manufacturer must measure and report CREE, N<sub>2</sub>O, and CH<sub>4</sub> on 2012 and later IUVP vehicles
    - Measurement is required on **FTP and Highway** cycles, only.
    - For ethanol flexible fueled vehicles, perform gasoline tests only
      - Report the calculated E85 NMOG emissions per 86.1845-04(f)(2)
    - N<sub>2</sub>O measurement is not required until 2015 model year, ref. 86.1829(b)(1)(iii)(G); and 600.113(g)(2)(iv)(C).
  - Must measure and report optional CREE (OCREE) emissions, if the test group was certified based on the OCREE equation of 86.1818 (f)(2).
  - No IUCP threshold criteria or IUCP testing requirements
- EPA In-use Surveillance Testing
  - EPA may measure CREE/OCREE, N<sub>2</sub>O, CH<sub>4</sub> on 2012 and later in-use vehicles
    - FTP and Highway cycles only.
  - Any failures or unusual results would need to be addressed by the mfr.

**To:** [Ex. 7]@vw.com]  
**Cc:** [Ex. 7]@vw.com]; [Ex. 7]@vw.com;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 9/23/2011 5:55:26 PM  
**Subject:** Re: 2010 Volkswagen Group PC and LDT CAFE Reports seem to be missing some pages  
[CBI AVWX COMMON CAFE LDT R00.pdf](#)  
[CBI AVWX COMMON CAFE LDV R00.pdf](#)  
[2009 VW LDT CAFE Letter-from Verfiy-3-22-2010.pdf](#)

**Ex. 7**

These CAFE model year reports seem to be missing a few pages (when compared to the 2009 and earlier CAFE reports,).

For example, they don't include:

the data used in your calculations, ref 600.512-08(c)(1) to (c)(3);

fuel economy for each model type (and a list of model types) included in your calculation, ref 600.512-08(c)(1) to (c)(3);

Authenticity & accuracy of production data included in your calculation (signed by a vice-president or higher).

For example, I can't determine what model Bentlys, Lamborghinis, & Bugattis were included in your calculations.

When you get a chance, please revise your CAFE letters (adding the missing information), and email me copies of the revised letters and enter a pdf copies into Verify.

I'll include the 2009 VW Truck CAFE letter as an example.

Thanks

**Ex. 6**

Dave

**From:** [Ex. 7]@vw.com>  
**To:** David Good/AA/USEPA/US@EPA  
**Cc:** [Ex. 7]@vw.com>  
**Date:** 09/02/2011 07:27 AM  
**Subject:** 2010 Volkswagen Group PC and LDT CAFE Reports

Hello Dave;

Please find two files with the 2010 Volkswagen Group of America, Inc. Passenger Car and Light-Duty Truck Final CAFE Reports.

If you have any questions, please contact me or **Ex. 7**

Best regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Engineering and Environmental Office (EEO)

**Ex. 7**

**Ex. 7** @VW.com

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Linc Wehrly  
Compliance and Innovative Strategies Division  
Light-Duty Vehicle Group  
U.S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, Michigan 48105

Dr. Christoph Kohnen Name  
General Manager Title  
EEO Department  
248 754 4201 Phone  
248 754 4207 Fax  
Christoph.Kohnen@vw.com E-Mail

September 1, 2011 Date

Subject: Volkswagen Group 2010 Final LDT CAFE Report

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Enclosed is the manufacturer's calculation for the 2010 final fuel economy average. This calculation is provided for the Volkswagen Group Import Truck category and in accordance with the regulations contained in 40 CFR 600.510-93. The final CAFE value is based upon approved EPA fuel economy data and final production volumes for the 2010 model year. The report has successfully been processed using the CFEIS system and submitted through Verify. The Excel manufacturer CAFE calculator file was also included with this submittal. The Volkswagen Group will choose to comply with the unreformed LDT CAFE standard of **23.5** MPG for the 2010 model year in accordance with 49 CFR 533.5 (f), paragraph (a) Table IV.

The final Volkswagen Group Import Truck CAFE value is **25.2** MPG.

If you have any questions or require additional information, please contact me or Richard Thomas of my staff at (248) 754-4213 or email Richard.Thomas@VW.com.

Sincerely,  
VOLKSWAGEN GROUP of AMERICA, Inc.



Dr. Christoph Kohnen, General Manager  
Engineering and Environmental Office

Attachments

# 2010 FINAL CAFE-IMPORT TRUCK VOLKSWAGEN GROUP MANUFACTURER AVERAGE CALCULATION

Calculate fuel economy average of domestically and non-domestically produced automobiles where:

$$\text{Import Average IAFE} = \frac{\text{TIPA}}{n} = 25.2 \text{ MPG (unadjusted)}$$

$$\sum_{\text{MT}=1} \frac{\text{IMT}}{\text{FEMT}}$$

IAFE	Average fuel economy of non-domestically produced trucks.
TIPA	Total number of trucks produced or imported for sale in the United States.
IMT	Number of trucks of a model type produced or imported.
FEMT	Fuel economy, MPG for a model type.
MT	Model type
n	Total number of model types imported (as applicable in a manufacturer's model year).

$$\text{IAFE (unadjusted)} = \frac{46,034}{1824.3746} = 25.2328 \text{ MPG}$$

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Linc Wehrly  
Compliance and Innovative Strategies Division  
Light-Duty Vehicle Group  
U.S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, Michigan 48105

Dr. Christoph Kohnen Name  
General Manager Title  
EEO Department  
248 754 4201 Phone  
248 754 4207 Fax  
Christoph.Kohnen@vw.com E-Mail

September 1, 2011 Date

Subject: Volkswagen Group 2010 Final CAFE Report

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Dear Mr. Wehrly,

Enclosed is the manufacturer's calculation for the 2010 final fuel economy average. This calculation is provided for the Volkswagen Import Passenger Car category and in accordance to the regulations contained in 40 CFR 600.510-93. The final CAFE value is based upon approved EPA fuel economy data and final production volumes for the 2010 model year vehicles. The report has successfully been processed using the CFEIS system and submitted through Verify. The final Import Passenger Car CAFE value adjusted is 33.3 MPG.

The attachments to this letter contain the domestic content calculation as requested in the EPA certification mail-out CD-92-06. The Volkswagen Group of America, Inc. procedure for this calculation follows the procedure outlined in 40 CFR 600.511-80. Our procedure is described as follows:

- For vehicles produced outside of the NAFTA territory, the "declared value" of foreign components is basically, the ex factory value of each of the models which we have imported. The freight and insurance is added to this value and is labeled as "adjusted import value". The value of U.S. components has not been excluded because this value is included in the declared value upon importation of the vehicles. The "cost of production" as defined in the regulations equates to our wholesale price to the dealer.
- For vehicles produced within the NAFTA territory (Mexico), we followed the procedure established according to NAFTA Appendix 300-A.3, where Paragraph 1 states:

"For purposes of the Energy Policy and Conservation Act of 1975, 42 U.S.C. 6201...the United States shall consider an automobile to be domestically manufactured in any model year if at least 75 percent of the cost to the manufacturer of such automobile is attributable to value added in Canada, Mexico or the United



States...Paragraph 1 shall apply beginning with the next model year after January 1, 2004, where the enterprise subject to the fuel economy requirements for those automobiles under the CAFE Act, has not made an election under subparagraph a)."

For purposes of paragraph 1, and according to 40 CFR 600.511-80, the ratio obtained in the domestic production determination was obtained from dividing the sum of the declared value (as defined in §600.502) of all of the imported components installed or included on automobiles produced within such a car line within a given model year plus the cost of transportation and insuring such components to the United States Port of entry, by the cost of production (as defined in §600.52) of all automobiles within such a car line.

The calculated results for each model are listed in the right column entitled CAFE Ratio. These values are clearly greater than the 0.25 ratio and therefore all Volkswagen Group models are determined to be in the Import category.

If you have any questions or require additional information, please contact me or Mr. Richard Thomas at (248) 754-4213.

Sincerely,  
VOLKSWAGEN GROUP of AMERICA, Inc.



Dr. Christoph Kohnen  
General Manager  
Engineering and Environmental Office

attachments

2010 FINAL CAFE-LDV  
VOLKSWAGEN GROUP  
MANUFACTURER AVERAGE CALCULATION

Calculate fuel economy average of domestically and non-domestically produced automobiles where:

$$\text{Import Average IAFE} = \frac{\text{TIPA}}{n} = 33.1 \text{ MPG (unadjusted)}$$

$$\sum_{\text{MT}=1} \frac{\text{IMT}}{\text{FEMT}}$$

IAFE	Average fuel economy of non-domestically produced automobiles.
TIPA	Total number of passenger automobiles produced or imported for sale in the United States.
IMT	Number of passenger automobiles of a model type produced or imported.
FEMT	Fuel economy, MPG for a model type.
MT	Model type
n	Total number of model types imported (as applicable in a manufacturer's model year).

$$\text{IAFE (unadjusted)} = \frac{274338}{8294.9195} = 33.0730 \text{ MPG}$$

$$\text{IAFE (adjusted)} = 33.3 \text{ MPG}$$

VOLKSWAGEN GROUP OF AMERICA, INC.  
DOMESTIC CONTENT CALCULATION FOR 2010 FINAL CAFE

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<u>AUDI</u>	<u>MSRP</u>	<u>Import Value</u>	<u>Ocean Freight</u>	<u>Insurance</u>	<u>Adjusted Import Value</u>	<u>Wholesale Price</u>	<u>CAFE Ratio</u>
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**Ex. 4 - CBI**

Volkswagen Group of America, Inc.  
Domestic Content Calculation for 2010MY

**Ex. 4 - CBI**



VOLKSWAGEN



# Ex. 4 - CBI

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Linc Wehrly  
Compliance and Innovative Strategies Division  
Light-Duty Vehicle Group  
U.S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, Michigan 48105

Dr. Christoph Kohnen Name  
General Manager Title  
EEO Department  
248 754 4201 Phone  
248 754 4207 Fax  
Christoph.Kohnen@vw.com E-Mail

March 22, 2010 Date

Subject: Volkswagen Group 2009 Final LDT CAFE Report

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Enclosed is the manufacturer's calculation for the 2009 final fuel economy average. This calculation is provided for the Volkswagen Group Import Truck category and in accordance with the regulations contained in 40 CFR 600.510-93. The final CAFE value is based upon approved EPA fuel economy data and final production volumes for the 2009 model year. The report has successfully been processed using the CFEIS system and submitted through Verify. The Excel manufacturer CAFE calculator file was also included with this submittal. The Volkswagen Group will choose to comply with the unreformed LDT CAFE standard of **23.1** MPG for the 2009 model year in accordance with 49 CFR 533.5 (f), paragraph (a) Table IV.

The final Volkswagen Group Import Truck CAFE value is **24.5** MPG.

If you have any questions or require additional information, please contact me or Richard Thomas of my staff at (248) 754-4213 or email Richard.Thomas@VW.com.

Sincerely,  
VOLKSWAGEN GROUP of AMERICA, Inc.



Dr. Christoph Kohnen, General Manager  
Engineering and Environmental Office

Attachments

# 2009 FINAL CAFE-IMPORT TRUCK VOLKSWAGEN GROUP MANUFACTURER AVERAGE CALCULATION

Calculate fuel economy average of domestically and non-domestically produced automobiles where:

$$\text{Import Average IAFE} = \frac{\text{TIPA}}{n} = 24.5 \text{ MPG (unadjusted)}$$

$$\sum_{\text{MT}=1} \frac{\text{IMT}}{\text{FEMT}}$$

IAFE	Average fuel economy of non-domestically produced trucks.
TIPA	Total number of trucks produced or imported for sale in the United States.
IMT	Number of trucks of a model type produced or imported.
FEMT	Fuel economy, MPG for a model type.
MT	Model type
n	Total number of model types imported (as applicable in a manufacturer's model year).

$$\text{IAFE (unadjusted)} = \frac{37,891}{1549.2697} = 24.4573 \text{ MPG}$$

## 2009 VOLKSWAGEN GROUP FINAL MODEL YEAR CAFE REPORT

### Import Light Duty Truck CAFE

CARLINE	CID	TRANS	INERTIA	MODEL TYPE FUEL ECONOMY		
				CITY	HWY	COMBINED
Touareg	195	S6q	5500	17.5993	26.9114	20.8
Touareg	181	S6q	5500	21.9000	34.4000	26.2
Touareg	254	S6q	5500	15.7000	25.1000	18.9
Tiguan	121	M6	4000	23.3000	36.2000	27.8
Tiguan	121	S6	4000	22.9000	34.1000	26.9
Tiguan 4-Motion	121	S6q	4000	22.4494	33.3000	26.3
Audi Q7	195	S6q	5500	17.5993	26.9114	20.8
Audi Q7	181	S6q	6000	19.8000	33.3000	24.2
Audi Q7	254	S6q	6000	16.2000	24.6000	19.1
Audi Q5	195	S7q	4500	22.7000	30.7000	25.7

SALES

**Ex. 4 - CBI**

CAFE UNROUNDED = 24.4573

VOLKSWAGEN GROUP CAFE (MPG) = **24.5**

UNREFORMED CAFE STANDARD = 23.1



**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Wed 9/28/2011 1:12:36 PM  
**Subject:** Flex-Fuel Test Sequence

Hello Vince,

Just for clarity I need a little more information about the testing sequence.

I believe that Flex-Fuel Evap tests are done with E10 and the exhaust tests with E85.

Is the Ethanol test sequence below correct?

fuel change w/E10 – prep – soak / E10 FTP / E10 2-Day Evap / fuel change w/E85 – prep – soak / E85 FTP /  
E85 Hwy / E85 US06

Alternate (fuel change w/E85 – prep – soak / E85 FTP / E85 Hwy / E85 US06 / fuel change w/E10 – prep –  
soak / E10 FTP / E10 2-Day Evap)

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Michael Olechiw/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Wed 9/28/2011 3:45:06 PM  
**Subject:** EPA Meetings with VW Group - September 29, 2011

Hello Michael and Jim:

I am not sure if our meetings tomorrow morning and afternoon will be in the same room; however, is it possible to have a speaker telephone in the room(s)? There are a couple of people from the VW Group in Germany that would like to join in the meeting.

I will establish a conference call number and passcode, Ex. 7 so the only need is a speaker phone.

We will also bring a portable projector, so no need to worry about that.

Best regards,

Ex. 7

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: Ex. 7@vw.com

**To:** [Ex. 7]@audi.de]; ichael  
Olechiw/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA; [Ex. 7]  
[Ex. 7]@volkswagen.de]; im Snyder/AA/USEPA/US@EPA; [Ex. 7]  
[Ex. 7]@volkswagen.de]; [Ex. 7]  
[Ex. 7]@volkswagen.de]; [Ex. 7]@volkswagen.de];  
[Ex. 7]@AUDI.DE]; [Ex. 7]  
[Ex. 7]@vw.com]  
**Cc:** [Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Wed 9/28/2011 3:56:15 PM  
**Subject:** Invitation: EPA Meetings (Sep 29 09:00 AM EDT in Telephone Conference)

To all:

I have set up a call-in number for tomorrow's meetings with EPA, if you wish to join (I hit the send button too soon on the prior invitation).

This does not require any action on the part of EPA staff other than to provide a speaker telephone. I have included EPA staff for information.

There are two meetings, starting at 0900hr Detroit time and 1300hr Detroit time, with the call-in number open for the entire time (0900 – 1530hr Detroit time).

Details:

The following is a telephone call-in number for the EPA meetings tomorrow.

You have been invited to attend a conference call. Please accept or reject. Details are below.

Audio Conference Information:

Bridge Name: [Non-Responsive]

Participant Code: [Non-Responsive]

Bridge Dial-in Number: [Non-Responsive]

Best regards,

[Ex. 7]

**To:** Snyder.Jim@epamail.epa.gov[]

**Cc:**

Anderson.Tom@epamail.epa.gov;Ball.Joel@epamail.epa.gov;French.Roberts@epamail.epa.gov;Healy.Stephen@epamail.epa.gov;[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
all.Joel@epamail.epa.gov;French.Roberts@epamail.epa.gov;Healy.Stephen@epamail.epa.gov;[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
rench.Roberts@epamail.epa.gov;Healy.Stephen@epamail.epa.gov;[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
ealy.Stephen@epamail.epa.gov;[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
evers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
eineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
pears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[]; ehrlly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/29/2011 4:38:30 PM  
**Subject:** Reminder: Today's VW Audi MTG IN N66 not 126

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Snyder.Jim@epamail.epa.gov  
**To:** Nevers.Chris@epamail.epa.gov, [Ex. 7] Wehrly.Linc@epamail.epa.gov, French.Roberts@epamail.epa.gov, Spears.Matt@epamail.epa.gov  
**Cc:** Ball.Joel@epamail.epa.gov, Reineman.Martin@epamail.epa.gov, Healy.Stephen@epamail.epa.gov, Anderson.Tom@epamail.epa.gov  
**Date:** 09/28/2011 01:17 PM  
**Subject:** Mtg with VW Audi: PHEV fuel economy, labeling and misc certification room change to N66

The VW meeting thursday afternoon has moved to N66. Matt Spears asked to trade rooms with us since they have an all day event in 126.

Jim Snyder  
Light-Duty Vehicle Group

Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** christoph.kohnen@vw.com;richard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; ichard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** john.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;alan.berkowitz@nhtsa.dot.gov;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]; N=Aaron Hula/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 10/11/2011 9:09:23 PM  
**Subject:** EPA CAFE letter & calculation attached - 2010 VW Group IP, LT  
[2010 VWX LT 20111011 085538 CAFE.pdf](#)  
[2010 VWX IP 20111011 085439 CAFE.pdf](#)

This e-mail message forwards a signed EPA letter and Corporate Average Fuel Economy (CAFE) calculation to your office.

This e-mail and the Adobe Acrobat (.pdf) attachment are an official Agency action. If there is a problem with the attachment or if you are not the intended recipient, please contact your certification team representative immediately. Adobe Acrobat Reader version 5.0 or later is required to open the attached PDF document(s).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ANN ARBOR, MICHIGAN 48105  
OFFICE OF TRANSPORTATION AND AIR QUALITY

October 11, 2011

Dr. Christoph Kohnen  
Manager  
Engineering and Environmental Office  
Volkswagen  
3800 Hamlin Road  
Auburn Hills, MI 48326

Dear Dr. Kohnen:

This letter serves to formally acknowledge the receipt of your 2010 final average fuel economy calculation for Light Trucks. The EPA-calculated and the manufacturer-submitted mpg values for this calculation are shown on the enclosed 'CAFE Report' page of EPA's calculation.

In accordance with 40 CFR 600.510-08(e), we calculated an adjusted final value of 25.2 mpg; this value will serve as our official determination.

A copy of the calculation is enclosed.

Sincerely yours,

Eric Wehrly, Group Manager  
Light-Duty Vehicles Group  
Compliance and Innovative Strategies Division

Enclosures

cc: J. Finneran, NHTSA





VERIFY ENGINE AND VEHICLE COMPLIANCE SYSTEM  
CORPORATE AVERAGE FUEL ECONOMY (CAFE) REPORT  
MANUFACTURERS FUEL ECONOMY CALCULATION FOR MODEL YEAR 2010

Report Date: October 11, 2011  
Manufacturer Name: Volkswagen  
Compliance Category: Light Trucks  
Official Production: Ex. 4 - CBI  
Official CAFE Value: 25.2 mpg  
Official CAFE Standard: 23.5 (Unreformed)

Submitted by Mfr: April 14, 2011, Transaction ID: \_b6a4c38b-3e18-44da-9f8d-1cb410157125

	<u>EPA Calculation</u>	<u>Mfr Calculation</u>	<u>Calc Warnings</u>
--	------------------------	------------------------	----------------------

Baseline Calculation (No AMFA credit)			
Unadjusted Unrounded:	25.2328	25.2328	-
Unadjusted Rounded:	25.2	-	-
Adjusted (TPA) Unrounded:	25.2328	-	-
Adjusted (TPA) Rounded:	25.2	N/A	-

Final Calculation (Incl AMFA credit)			
Unadjusted Unrounded:	25.2328	25.2328	-
Unadjusted Rounded:	25.2	-	-
Adjusted (TPA) Unrounded:	25.2328	-	-
Adjusted (TPA) Rounded:	25.2	N/A	-

Total Production Volume:			
CAFE Value:	25.2	Ex. 4 - CBI	-
		25.2	-

Statistics	
Model Types:	9
Base Levels:	9
Configurations:	11
Tested:	11
Not Tested:	0
Tested Production Volume:	Ex. 4 - CBI
Percent of Total Production	
Represented by Test Vehicles:	100.00% (100%)

Verify Macro Status  
Source: System

Verify: Production  
Oracle in InstantClient11.1  
Processing - Mr. 2010, Mr. VWX - Volkswagen, Category: LT - Light Trucks  
LDFE\_CAFE\_HEADER.ID: 34  
LDFE\_CAFE\_COMMENTS.ID: 0  
LDFE\_CAFE\_ID: 99 (N) Final=y Active=N 2011-03-24 09:43:52 899000 \_0586dc66-668c-46f1-ab11-002c556ee9dd Mr. Richard E Thomas Jr.  
LDFE\_CAFE\_ID: 137 (C) Final=y Active=N 2011-04-12 17:56:52 478000 \_8246c178-0a6b-470c-a46c-4e29365ec825 Mr. Richard E Thomas Jr.  
LDFE\_CAFE\_ID: 145 (C) Final=y Active=N 2011-04-14 10:56:26 328000 \_e8123831c113-445d-b391-84a9a5376f60 Mr. Richard E Thomas Jr.  
LDFE\_CAFE\_ID: 146 (C) Final=y Active=y 2011-04-14 13:56:13 024000 \_b6d4c38b-36f8-44da-9f8d-1dc410157125 Mr. Richard E Thomas Jr.

Baseline Calculation:  
Unrounded Unadjusted 25.2328  
Rounded Unadjusted 25.2  
Unrounded Adjusted (TPA) 25.2328  
Rounded Adjusted (TPA) 25.2  
Final Calculation:  
Unrounded Unadjusted 25.2328  
Rounded Unadjusted 25.2  
Unrounded Adjusted (TPA) 25.2  
Rounded Adjusted (TPA) 25.2328  
Final Production Volume N/A  
Official CAFE MPG N/A  
Final Status Y  
Standard Type Unreformed  
CAFE Standard 23.5  
Unrounded Reformed Standard 0.0000  
Reformed Standard Comment: (none)

Mr. Verify  
Dual Fuel / Alt Fuel  
0.0%

Calc. ID	Mr. Cd	MT Index	Dvsn	CD	Carlin CD	Division Name	Carline Name	Engine	Fuel(s)	Trans	Lockup	Creep	Dv. Sys	Prd Vol	Tst Vol	Cy FE	Baseline Fuel	Prd Vol	Dual Fuel / Alt Fuel	AMFA	
003196	ADK	048	1	330		Audi	C5	3.2 NA	GP	S46	Y	N	A			22.7000	30.7000	25.7155	-	22.7000	
003198	ADK	063	1	320		Audi	C7	3.0 TC	DU	S46	Y	N	A			19.8000	33.3000	24.2182	-	19.8000	
003192	VWX	062	2	320		Audi	C7	3.6 NA	GP	S46	Y	N	A			17.5425	26.4572	20.6778	-	17.5425	
003194	ADK	011	1	320		Audi	C7	4.2 NA	GP	S46	Y	N	A			16.2000	24.6000	19.1412	-	16.2000	
003193	ADK	051	2	160		Volkswagen	TIGUAN	2.0 TC	GP	M6	N	N	F			23.3000	36.2000	27.7500	-	23.3000	
003197	ADK	050	2	160		Volkswagen	TIGUAN	2.0 TC	GP	S46	N	N	F			22.9000	34.1000	26.8716	-	22.9000	
003200	ADK	049	2	165		Volkswagen	TIGUAN 4MOTION	2.0 TC	GP	S46	N	N	A			22.5000	33.3000	26.3449	-	22.5000	
003195	ADK	064	2	140		Volkswagen	Touareg	3.0 TC	DU	S46	Y	N	A			21.9000	34.4000	26.1811	-	21.9000	
003199	VWX	061	1	140		Volkswagen	TouAREG	3.6 NA	GP	S46	Y	N	A			17.5425	26.4572	20.6778	-	17.5425	
Totals																22.7000	30.7000	25.7155	22.7000	30.7000	25.7155

## EX. 4 - CBI

### Baseline CAFE Calculation (Non-AMFA)

Unadj CAFE = TotalProdVol / TotalCmbDenom = 46034 / 1824.37461824715 = 25.2327562221

Unadj CAFE(4) = 25.2328

Unadj CAFE(1) = 25.2

Compliance Category 'Light Trucks', Adjusted FE = Unadjusted FE

Adjusted CAFE = 25.2327562221

Adjusted CAFE(4) = 25.2328

Adjusted CAFE(1) = 25.2

Official CAFE Value - Includes AMFA Credits, clipped to the maximum increase allowed.

Official CAFE = 25.2

Total Model Types 9  
Total Base Levels 9  
Total Configurations 11  
Total Tested Configurations 11  
Total Untested Configurations 0



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ANN ARBOR, MICHIGAN 48105  
OFFICE OF TRANSPORTATION AND AIR QUALITY

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October 11, 2011

Dr. Christoph Kohnen  
Manager  
Engineering and Environmental Office  
Volkswagen  
3800 Hamlin Road  
Auburn Hills, MI 48326

Dear Dr. Kohnen:

This letter serves to formally acknowledge the receipt of your 2010 final average fuel economy calculation for Import Passenger Vehicles. The EPA-calculated and the manufacturer-submitted mpg values for this calculation are shown on the enclosed 'CAFE Report' page of EPA's calculation.

In accordance with 40 CFR 600.510-08(e), we calculated an adjusted final value of 33.3 mpg; this value will serve as our official determination.

A copy of the calculation is enclosed.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Linc Wehrly", written over a rectangular stamp area.

Linc Wehrly, Group Manager  
Light-Duty Vehicles Group  
Compliance and Innovative Strategies Division

Enclosures

cc: J. Finneran, NHTSA



VERIFY ENGINE AND VEHICLE COMPLIANCE SYSTEM  
CORPORATE AVERAGE FUEL ECONOMY (CAFE) REPORT  
MANUFACTURERS FUEL ECONOMY CALCULATION FOR MODEL YEAR 2010

Report Date: October 11, 2011  
Manufacturer Name: Volkswagen  
Compliance Category: Import Passenger Vehicles  
Official Production: 274,338  
Official CAFE Value: 33.3 mpg  
Official CAFE Standard: 27.5 (Unreformed)

Submitted by Mfr: July 18, 2011, Transaction ID: \_ad4d0a30-954d-42e5-9f79-331866140631

	<u>EPA Calculation</u>	<u>Mfr Calculation</u>	<u>Calc Warnings</u>
--	------------------------	------------------------	----------------------

Unadjusted Unrounded:	33.0730	33.0730	-
Unadjusted Rounded:	33.1	-	-
Adjusted (TPA) Unrounded:	33.3138	-	-
Adjusted (TPA) Rounded:	33.3	33.3	-

<u>Final Calculation (Incl AMFA credit)</u>			
Unadjusted Unrounded:	33.0730	33.0730	-
Unadjusted Rounded:	33.1	-	-
Adjusted (TPA) Unrounded:	33.3138	-	-
Adjusted (TPA) Rounded:	33.3	33.3	-

Total Production Volume:		<div>Ex. 4 - CBI</div>	-
CAFE Value:	33.3	33.3	-

<u>Statistics</u>			
Model Types:		73	
Base Levels:		79	
Configurations:		117	
Tested:		115	
Not Tested:		2	
Tested Production Volume:			
Percent of Total Production			
Represented by Test Vehicles:			
		<div>Ex. 4 - CBI</div>	
	100.00%	(100%)	

Verify\_Production

Processing - MY: 2010, Mfr: VWX - Volkswagen, Category: IP - Import Passenger Vehicles

LDFE

[illegible]

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**Not**

33.0730	33.0730
-	33.1
-	33.3138
33.3	33.3

• • • • •

-	33.3138	Dual Fuel
33.3	33.3	/ Alt Fuel

3:5:2

Y

Unreformed	27.5
	0.0000
(none)	

Calc ID	Mfr Cd	MT Index	Dvsn	CD	CatLn CD	Division Name	Carline Name	Engine	Fuels	Trans	Lookup	Creep	Dv Sys	Ptd Vol	Tst Vol	CV FE	Baseline Hwy FE	Cmb FE	Ptd Vol	Dual Fuel / Alt Fuel	Cmb FE
004780	VWV	076	2	65	65	Audi	A3	2.0 TC	DU	SA6	N	N	N	F	38,397	58,579	45,443	-	-	-	38,397
004812	ADX	046	1	65	65	Audi	A3	2.0 TC	GP	SA6	N	N	F	26,962	40,764	30,478	-	-	-	26,962	
004847	ADX	047	1	66	66	Audi	A3	2.0 TC	GP	SA6	N	N	F	27,200	37,100	31,169	-	-	-	27,200	
004813	ADX	043	1	10	10	Audi	A4 QUATTRO	2.0 TC	GP	CVT1	N	N	F	29,258	42,807	34,114	-	-	-	29,258	
004790	ADX	018	1	25	25	Audi	A4 QUATTRO	2.0 TC	GP	CVT1	N	N	F	29,258	42,807	34,114	-	-	-	29,258	
004819	ADX	020	1	20	20	Audi	A4 QUATTRO	2.0 TC	GP	M6	N	N	A	27,672	42,404	30,246	-	-	-	27,672	
004837	ADX	024	1	20	20	Audi	A4 QUATTRO	2.0 TC	GP	M6	N	N	A	27,672	42,404	30,246	-	-	-	27,672	
004824	ADX	019	1	51	51	Audi	A5 Cabriolet	2.0 TC	GP	CVT1	N	N	F	29,258	42,807	34,114	-	-	-	29,258	
004807	ADX	023	1	53	53	Audi	A5 Cabriolet quattro	2.0 TC	GP	CVT1	N	N	F	29,258	42,807	34,114	-	-	-	29,258	
004834	ADX	025	1	40	40	Audi	A5 QUATTRO	2.0 TC	GP	M6	N	N	A	27,672	42,404	30,246	-	-	-	27,672	
004786	ADX	022	1	40	40	Audi	A5 QUATTRO	2.0 TC	GP	M6	N	N	A	25,998	37,813	30,246	-	-	-	25,998	
004848	ADX	060	1	40	40	Audi	A5 QUATTRO	3.2 NA	GP	SA6	N	N	A	22,600	36,200	27,198	-	-	-	22,600	
004830	ADX	059	1	80	80	Audi	A6	3.2 NA	GP	CVT1	N	N	F	23,000	38,900	28,184	-	-	-	23,000	
004849	ADX	035	1	78	78	Audi	A6 AVANT QUATTRO	3.0 SC	GP	SA6	N	N	A	21,800	34,800	26,205	-	-	-	21,800	
004797	ADX	034	1	75	75	Audi	A6 QUATTRO	3.0 SC	GP	SA6	N	N	A	21,800	34,800	26,205	-	-	-	21,800	
004792	ADX	007	1	95	95	Audi	A6 QUATTRO	4.2 NA	GP	SA6	N	N	A	19,853	31,376	23,784	-	-	-	19,853	
004832	ADX	006	1	90	90	Audi	A8	4.2 NA	GP	SA6	N	N	A	19,853	31,376	23,784	-	-	-	19,853	
004850	ADX	032	1	90	90	Audi	A8	4.2 NA	GP	SA6	N	N	A	19,853	31,376	23,784	-	-	-	19,853	
004751	ADX	033	1	90	90	Audi	R8	4.2 NA	GP	AM6	N	N	A	15,400	25,045	18,628	-	-	-	15,400	
004788	ADX	016	1	90	90	Audi	R8	5.2 NA	GP	AM6	N	N	A	15,300	26,800	18,951	-	-	-	15,300	
004801	ADX	017	1	90	90	Audi	R8	5.2 NA	GP	AM6	N	N	A	15,800	24,800	18,839	-	-	-	15,800	
004756	ADX	036	1	30	3	Audi	S4	3.0 SC	GP	M6	N	N	A	21,500	23,900	16,955	-	-	-	21,500	
004758	ADX	037	1	30	3	Audi	S4	3.0 SC	GP	SA7	N	N	A	21,600	35,000	26,060	-	-	-	21,600	
004853	ADX	010	1	42	42	Audi	S5	4.2 NA	GP	M6	N	N	A	17,300	29,300	21,068	-	-	-	17,300	
004809	ADX	009	1	56	56	Audi	S5	4.2 NA	GP	SA6	N	N	A	20,400	31,000	24,108	-	-	-	20,400	
004844	ADX	038	1	56	56	Audi	S5	3.0 SC	GP	SA7	N	N	A	20,300	34,000	24,796	-	-	-	20,300	
004816	ADX	042	1	56	56	Audi	S5 Cabriolet	3.2 NA	GP	SA6	N	N	A	27,241	39,336	31,615	-	-	-	27,241	
004820	ADX	044	1	57	57	Audi	S5 Cabriolet	2.0 TC	GP	SA6	N	N	A	27,241	39,336	31,615	-	-	-	27,241	
004810	ADX	045	1	38	38	Audi	TT ROADSTER QUATTRO	2.0 TC	GP	SA6	N	N	A	21,500	23,900	16,955	-	-	-	21,500	
004787	BEX	082	1	75	75	Bentley Motors Ltd.	Brooklands	6.8 TC	GP	A6	N	N	R	11,560	21,031	14,450	-	-	-	11,560	
004795	BEX	083	1	60	60	Bentley Motors Ltd.	Continental Flying Spur	6.0 TC	GP	SA6	N	N	A	12,523	23,261	15,804	-	-	-	12,523	
004840	BEX	040	1	40	40	Bentley Motors Ltd.	Continental Flying Spur	6.0 TC	GP	SA6	N	N	A	12,800	23,800	16,161	-	-	-	12,800	
004833	BEX	041	1	35	35	Bentley Motors Ltd.	Continental GT	6.0 TC	GP	SA6	N	N	A	12,523	23,261	15,804	-	-	-	12,523	
004803	BEX	089	1	45	45	Bentley Motors Ltd.	Continental GT	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004818	BEX	030	1	50	50	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004827	BGT	001	1	500	500	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004831	ADX	012	3	406	406	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004815	ADX	014	3	426	426	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004826	ADX	013	3	426	426	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004825	ADX	015	3	426	426	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004811	NLX	004	1	472	472	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004785	NLX	002	1	472	472	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004821	NLX	005	1	492	492	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004851	NLX	003	1	492	492	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004782	NLX	005	1	293	293	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004794	VWV	053	1	293	293	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	
004796	VWV	071	1	293	293	Bentley Motors Ltd.	Continental Supersports	6.0 TC	GP	SA6	N	N	A	14,400	24,400	17,653	-	-	-	14,400	

004793	VWVX	072	1	298	Volkswagen	CC 4MOTION	3.6 NA	GP	SA6	Y	N	A
004783	VWVX	057	1	216	Volkswagen	EOS	2.0 TC	GP	M6	N	N	F
004804	VWVX	068	1	216	Volkswagen	EOS	2.0 TC	GP	SA6	N	N	F
004823	VWVX	079	1	206	Volkswagen	GOLF	2.0 TC	DU	M6	N	N	F
004805	VWVX	075	1	206	Volkswagen	GOLF	2.0 TC	DU	SA6	N	N	F
004779	VWVX	031	1	206	Volkswagen	GOLF	2.5 NA	G	M5	N	N	F
004829	VWVX	028	1	206	Volkswagen	GOLF	2.5 NA	G	SA6	Y	N	F
004800	ADX	056	2	211	Volkswagen	GTL	2.0 TC	GP	M6	N	N	F
004828	ADX	070	2	211	Volkswagen	GTL	2.0 TC	GP	M6	N	N	F
004817	VWVX	077	1	221	Volkswagen	JETTA	2.0 TC	DU	M6	N	N	F
004799	VWVX	074	1	221	Volkswagen	JETTA	2.0 TC	DU	SA6	N	N	F
004842	ADX	055	2	221	Volkswagen	JETTA	2.0 TC	GP	M6	N	N	F
004781	ADX	069	2	221	Volkswagen	JETTA	2.0 TC	GP	SA6	N	N	F
004802	VWVX	030	1	221	Volkswagen	JETTA	2.5 NA	G	M5	N	N	F
004846	VWVX	027	1	221	Volkswagen	JETTA	2.5 NA	G	SA6	Y	N	F
004822	VWVX	078	1	225	Volkswagen	JETTA SPORTWAGEN	2.0 TC	DU	M6	N	N	F
004836	VWVX	073	1	225	Volkswagen	JETTA SPORTWAGEN	2.5 NA	DU	SA6	N	N	F
004814	VWVX	029	1	225	Volkswagen	JETTA SPORTWAGEN	2.5 NA	G	M5	N	N	F
004784	VWVX	026	1	225	Volkswagen	JETTA SPORTWAGEN	2.5 NA	G	SA6	Y	N	F
004839	VWVX	067	1	230	Volkswagen	NEW BEETLE	2.5 NA	G	M5	N	N	F
004845	VWVX	065	1	230	Volkswagen	NEW BEETLE	2.5 NA	G	SA6	Y	N	F
004808	VWVX	066	1	235	Volkswagen	NEW BEETLE CONVERTIBLE	2.5 NA	G	SA6	Y	N	F
004789	VWVX	052	1	291	Volkswagen	PASSAT	2.0 TC	GP	SA6	N	N	F
004841	VWVX	054	1	292	Volkswagen	PASSAT WAGON	2.0 TC	GP	SA6	N	N	F

ConfMfg Tested % = 100 x TestedProdVol / TotalProdVol = 100 x 274338 / 274338 = 100.000000000000% = 100%  
 SFTTW3000 = TotalProdVol@TTW3000 / TotalProdVol = 16879 / 274338 = 0.0615000000 = 0.0615  
 SFTETW4000 = TotalProdVol@ETW4000 / TotalProdVol = 24058 / 274338 = 0.0877000000 = 0.0877

# Ex. 4 - CBI

Official CAFE Value - Includes AMFA Credits, clipped to the maximum increase allowed.

Official CAFE = 33.3

Total Model Types 73  
 Total Base Levels 79  
 Total Configurations 117  
 Total Tested Configurations 115  
 Total Untested Configurations 2

20.5000	33.5000	24.8373	-	-	-	-	-	20.5000	33.5000	24.8373
25.9945	41.4200	31.2279	-	-	-	-	-	25.9945	41.4200	31.2279
27.7856	40.9805	32.4936	-	-	-	-	-	27.7856	40.9805	32.4936
38.7437	58.7834	45.7643	-	-	-	-	-	38.7437	58.7834	45.7643
38.3977	58.5799	45.4430	-	-	-	-	-	38.3977	58.5799	45.4430
25.5267	39.6593	30.4019	-	-	-	-	-	25.5267	39.6593	30.4019
26.8000	40.1580	31.5178	-	-	-	-	-	26.8000	40.1580	31.5178
25.9945	41.4200	31.2279	-	-	-	-	-	25.9945	41.4200	31.2279
29.8426	43.5649	45.7643	-	-	-	-	-	29.8426	43.5649	45.7643
38.3977	58.5799	45.4430	-	-	-	-	-	38.3977	58.5799	45.4430
25.9945	41.4200	31.2279	-	-	-	-	-	25.9945	41.4200	31.2279
29.8426	43.5649	45.7643	-	-	-	-	-	29.8426	43.5649	45.7643
24.7807	39.6108	29.8016	-	-	-	-	-	24.7807	39.6108	29.8016
26.3640	38.9972	31.2936	-	-	-	-	-	26.3640	38.9972	31.2936
38.7437	58.7834	45.7643	-	-	-	-	-	38.7437	58.7834	45.7643
38.3977	58.5799	45.4430	-	-	-	-	-	38.3977	58.5799	45.4430
24.7807	39.6108	29.8016	-	-	-	-	-	24.7807	39.6108	29.8016
26.5640	39.9972	31.2936	-	-	-	-	-	26.5640	39.9972	31.2936
24.7846	39.5497	29.7891	-	-	-	-	-	24.7846	39.5497	29.7891
25.2566	40.8000	30.4823	-	-	-	-	-	25.2566	40.8000	30.4823
24.7960	39.7517	29.8496	-	-	-	-	-	24.7960	39.7517	29.8496
27.1035	42.4329	32.3651	-	-	-	-	-	27.1035	42.4329	32.3651
27.1035	42.4329	32.3651	-	-	-	-	-	27.1035	42.4329	32.3651

Ex. 4 - CBI

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 10/13/2011 2:55:34 PM  
**Subject:** VW Group Revised Evap Standard  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

I revised the evap. standards in Verify and in the Initial Application for the 2012 Audi Q5 Hybrid, test group CADXT02.02HUB. We inadvertently used the heavier weight LDT LEV2 evap. standards in the Initial Application. This vehicle is due to be confirmed on Nov 2nd, so I'm not sure if you might have to make a change on your end to reflect the correct standards as the result of our change.

Also, can you tell me if the Nov 2nd confirmatory testing is expected to be completed in one week, considering the evap. test?

Thanks,

Bill Rodgers

EEO Emission Certification

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

To: Jim Snyder/AA/USEPA/US@EPA[]  
Cc: [Ex. 7]@vw.com]  
From: [Ex. 7]  
Sent: Thur 10/13/2011 8:40:20 PM  
Subject: VW Group 2013 Cert Preview Plan  
[Ex. 7]@vw.com

Hello Jim,

I have uploaded our 2013 Certification Preview Letter for your review. We will contact you in the near future to arrange a meeting to discuss the details. In the mean time, please feel free to contact [Ex. 7] [Ex. 7] or myself if you have any immediate questions or concerns.

I will be [Ex. 6], so please contact [Ex. 7] during this time.

Regards,

[Ex. 7]

EEO Emission Certification

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

[Ex. 7]

[Ex. 7]@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 10/17/2011 2:32:14 PM  
**Subject:** VW Group: Answers for Questions Regarding Emission Testing Audi Q5 Hybrid  
CBI CADXT02.0HUB TST INS R00.PDF  
robert.hart@vw.com

Hello Jim,

The attachment contains the answers to EPA questions regarding emission testing of the MY 2012 Audi Q5 Hybrid.

I have also uploaded the attached file through the Verify System.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

## **1. Driver Instructions, Traction control, Test mode, Start Procedure**

### **Vehicle preconditioning:**

- ☐ one additional preconditioning cycle is required after the Load Determination (EPA meeting, August 19th, 2010)

### **Starting Instruction:**

- ☐ Place gearshift lever into “NEUTRAL”
- ☐ Apply the brake pedal
- ☐ push the ignition key → the message “Hybrid ready” appears in the instrument cluster

### **Traction Control:**

- ☐ Vehicle is on standard 4-Wheel-Drive.
- ☐ Traction system is in standard operation mode.
- ☐ Anti Lock System is in standard operation mode.

### **Special Cooling procedure:**

- ☐ Place the fan centered in front of the car

### **Battery cooling:**

- ☐ „Pollution protection functionality“ is disabled (EPA meeting, August 19th, 2010)

## **2. Canister Loading procedure** -> see attachment 1

## **3. Clamp (physical size)** -> see attachment 2

## **4. Vehicle Mounting** -> see attachment 3

## **5. Battery Data:**

- ☐ Normal Voltage: 264V
- ☐ Max Current: 180A

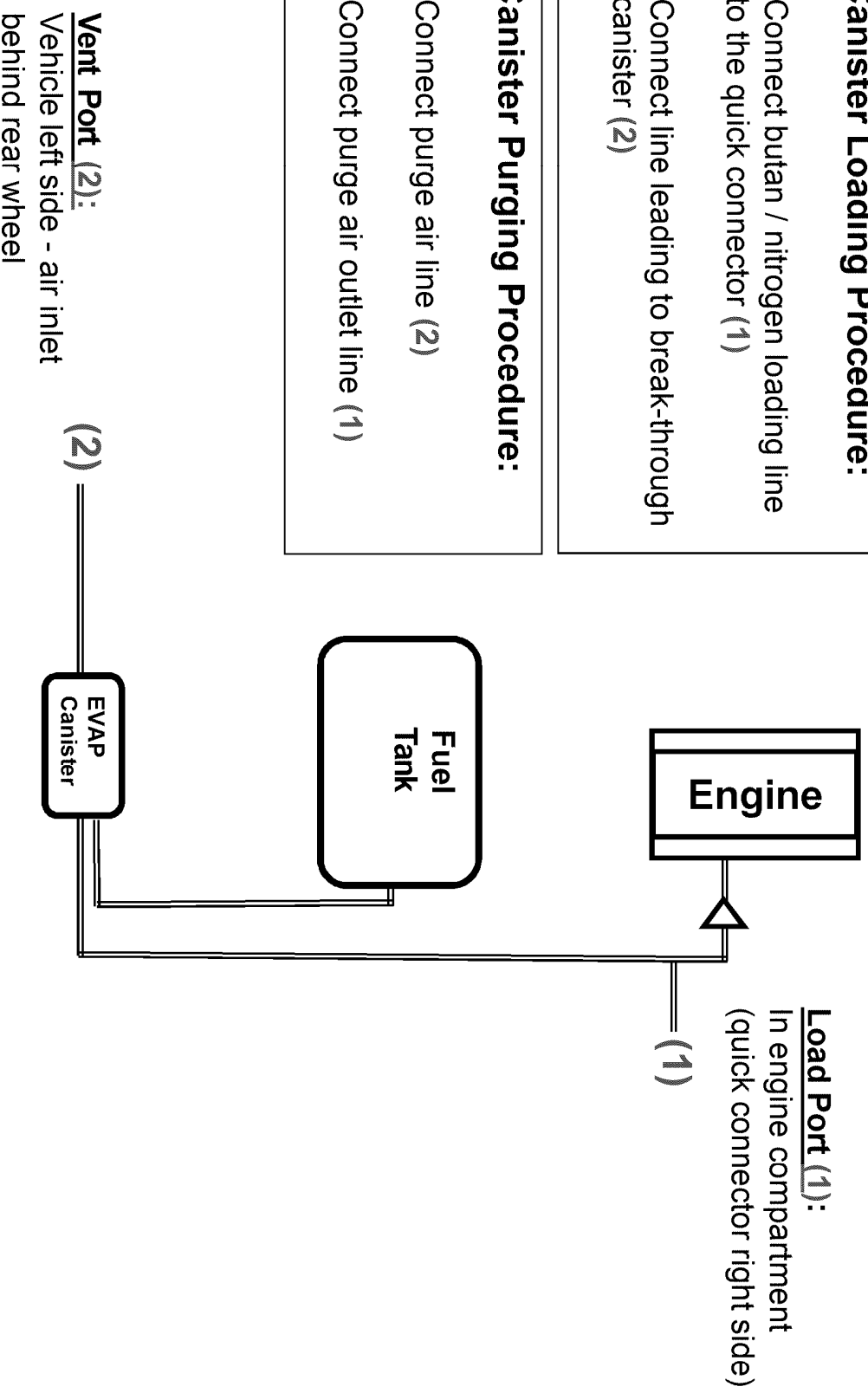
# Attachment 1: Structure of the Evap. System for Canister Loading/Purging

## Canister Loading Procedure:

- Connect butan / nitrogen loading line to the quick connector (1)
- Connect line leading to break-through canister (2)

## Canister Purging Procedure:

- Connect purge air line (2)
- Connect purge air outlet line (1)



## Attachment 2 – access for Hioki Clamp



## **Attachment 2 – access for Hioki Clamp – cont.**





## **Attachment 2 – access for Hioki Clamp – cont.**



## Attachment 3 – Vehicle mounting - rear



Towing eye



## Attachment 4 – Vehicle mounting - front



Towing eye



**To:** Jim Snyder/AA/USEPA/US@EPA;Stephen Healy/AA/USEPA/US@EPA[]; tephen Healy/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Wed 10/19/2011 5:56:57 PM  
**Subject:** Availability for Brief Conference Call

Hello Jim and Steve:

Audi will soon be delivering a hybrid vehicle for confirmatory testing at EPA. I left each of you a telephone message asking about your availability for a brief telephone conference with Audi to go over the test requirements.

Jim – I understand that you had a conversation with Ex. 7 and that you are booked for the remainder of this week.

As a starting point, I proposed that we have the conference call next Monday (October 24, 2011) at 0900 hr. I think that 30 minutes will be sufficient. A morning time is preferable since participants in Germany are six hours ahead of us.

Please suggest an alternative, if this does not fit your schedules. Once confirmed, I will set up a local call-in number.

Best regards,

Ex. 7

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Ex. 7

**Ex. 7**

E-Mail: **Ex. 7** @vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** [REDACTED] **Ex. 7** @AUDI.DE]  
**From:** [REDACTED] **Ex. 7**  
**Sent:** Wed 10/19/2011 10:22:35 PM  
**Subject:** RE: EPA/Audi Meeting Report

Hello Jim:

Just for information, our report from the August 19, 2010 meeting referenced in the test information for the Audi Q5 Hybrid was sent as shown below. The slides were sent in advance of the August 19, 2010 meeting.

I have requested more detail regarding the discussion topics.

Best regards,

[REDACTED] **Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: [REDACTED] **Ex. 7** @vw.com

From: [REDACTED] **Ex. 7**

Sent: Friday, September 24, 2010 8:58 AM

To: wehrly.linc@epa.gov; Snyder.Jim@epamail.epa.gov; Healy.Stephen@epamail.epa.gov;  
Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov

Subject: EPA/Audi Meeting Report

Hello all:

Attached is a copy of a report from a meeting between you and representatives of Audi AG and Volkswagen Group of America, Inc. This meeting was held on August 19, 2010.

Please note the open issues in the "Comments" section.

Best regards,

**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7** @vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]  
Cc: Ex. 7 @AUDI.DE]; Ex. 7  
Ex. 7 @vw.com]; tephen Healy/AA/USEPA/US@EPA[]  
From: Ex. 7  
Sent: Thur 10/20/2011 1:31:28 PM  
Subject: RE: EPA/Audi Meeting Report  
CBI CADXT02.0HUB\_TST\_INS\_R00.pdf

Hello Jim:

I have been in contact with Lothar Rech at Audi AG. The specific reason for the proposed conference call is to confirm; 1.) the understanding of the slides that were sent to you by Ex. 7 copy attached for extra measure!), and 2.) that the hybrid vehicle, as described, can be tested on the dynamometer at EPA.

If everything is clear and understandable, there may not be a need for the call. Audi has no further points to discuss at this time.

Please let me know if there are any open questions from your side.

Best regards,

Ex. 7

---

Ex. 7

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Ex. 7

E-Mail: Ex. 7 @vw.com

From: **Ex. 7**  
Sent: Wednesday, October 19, 2011 6:23 PM  
To: 'Snyder.Jim@epamail.epa.gov'  
Cc: **Ex. 7**  
Subject: RE: EPA/Audi Meeting Report

Hello Jim:

Just for information, our report from the August 19, 2010 meeting referenced in the test information for the Audi Q5 Hybrid was sent as shown below. The slides were sent in advance of the August 19, 2010 meeting.

I have requested more detail regarding the discussion topics.

Best regards,

**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

**Ex. 7**

E-Mail: **Ex. 7**@vw.com

From: **Ex. 7**

Sent: Friday, September 24, 2010 8:58 AM

To: wehrly.linc@epa.gov; Snyder.Jim@epamail.epa.gov; Healy.Stephen@epamail.epa.gov;

Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov

Subject: EPA/Audi Meeting Report

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**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7**@vw.com



To: Jim Snyder/AA/USEPA/US@EPA[]  
Cc: [Ex. 7]@vw.com]  
From: [Ex. 7]  
Sent: Thur 10/20/2011 3:11:00 PM  
Subject: RE: EPA/Audi Meeting Report

[Ex. 7]@vw.com  
[Ex. 7]@vw.com  
[wehrly.linc@epa.gov](mailto:wehrly.linc@epa.gov)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[Healy.Stephen@epamail.epa.gov](mailto:Healy.Stephen@epamail.epa.gov)  
[Nevers.Chris@epamail.epa.gov](mailto:Nevers.Chris@epamail.epa.gov)  
[Ball.Joel@epamail.epa.gov](mailto:Ball.Joel@epamail.epa.gov)  
[Ex. 7]@vw.com

Hello Jim,

Audi did have one other question. In order to plan the trip for the engineer who will accompany the test vehicle, Audi would like to know the order of the testing.

When the evap test will be performed may influence how long the engineer must stay here.

Based on the Wednesday test date, will the evap test be performed over the weekend or can all of the testing be accomplished by Friday?

Best regards,

[Ex. 7]

From: [Ex. 7]  
Sent: Thursday, October 20, 2011 9:31 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Cc: [Ex. 7] Healy.Stephen@epamail.epa.gov  
Subject: RE: EPA/Audi Meeting Report

Hello Jim:

I have been in contact with [Ex. 7] at Audi AG. The specific reason for the proposed conference call is to confirm; 1.) the understanding of the slides that were sent to you by Bob Hart (copy attached for extra measure!), and 2.) that the hybrid vehicle, as described, can be tested on the dynamometer at EPA.

If everything is clear and understandable, there may not be a need for the call. Audi has no further points to discuss at this time.

Please let me know if there are any open questions from your side.

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: [Ex. 7]@vw.com

From: [Ex. 7]  
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To: 'Snyder.Jim@epamail.epa.gov'  
Cc: [Ex. 7]  
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I have requested more detail regarding the discussion topics.

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: [Ex. 7]@vw.com

From: [Ex. 7]

Sent: Friday, September 24, 2010 8:58 AM

To: wehrly.linc@epa.gov; Snyder.Jim@epamail.epa.gov; Healy.Stephen@epamail.epa.gov;  
Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov

Subject: EPA/Audi Meeting Report

Hello all:

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Please note the open issues in the "Comments" section.

Best regards,

**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7**@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 10/24/2011 1:54:36 PM  
**Subject:** Question from Lamborghini  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Hello Jim,

Lamborghini's first flex-fuel car is scheduled for MY 2013. They have some questions since they have no previous experience with flex-fuel vehicle confirmatory tests at the EPA.

Due to the number of possible fuel changes - between gasoline, E10 and E85 fuels, Lamborghini would like to know the order tests are performed at the EPA when a flex-fuel car is tested with evap tests included.

I think you told me that testing will start with whatever fuel type is in the flex-fuel vehicle when it arrives and it doesn't matter which one it is. Does it make the most sense to start with gasoline?

Can Lamborghini request extra preconditioning between the switch from E10/E85 to gasoline to purge the ethanol from the fuel system?

If evap test confirmation is included, will both gasoline and E10 tests be performed at the EPA?

**Ex. 6**

Please Cc Bill Rodgers (William.rodgers@vw.com) on your reply.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 10/27/2011 12:32:09 PM  
**Subject:** VW Group Running Change  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Just FYI. I submitted a running change, with file name CBI\_CAD XV05.2LR8\_APP\_C01\_R00.PDF, to add two new models to the Audi test group CAD XV05.2LR8. No Certificate is required.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** [Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Thur 10/27/2011 12:40:46 PM  
**Subject:** VW Group - Audi Q5 Hybrid Confirmatory test  
[Ex. 7]@vw.com

Jim,

Reminder.

We are planning to deliver the Audi Q5 Hybrid, test vehicle VID: CAD-Q5A, to your facility on Monday morning around 9:30-10AM. I was in Germany last week but understand that you had correspondence with [Ex. 7] concerning some questions about this vehicle. If there is any further follow up or questions pending, please let me know as soon as possible.

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

**Ex. 7**

[Ex. 7]@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 10/27/2011 12:49:55 PM  
**Subject:** VW Group RE: Question from Lamborghini  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Jim,

One last item for today. I am following up for Bob Hart because Ex. 6 Have you had the chance to look at the following questions?

Thanks,

Bill

From: Hart, Robert (VWoA)  
Sent: Monday, October 24, 2011 9:55 AM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: Question from Lamborghini

Hello Jim,

Lamborghini's first flex-fuel car is scheduled for MY 2013. They have some questions since they have no previous experience with flex-fuel vehicle confirmatory tests at the EPA.

Due to the number of possible fuel changes - between gasoline, E10 and E85 fuels, Lamborghini would like to know the order tests are performed at the EPA when a flex-fuel car is tested with evap tests included.

- 1) I think you told me that testing will start with whatever fuel type is in the flex-fuel vehicle when it arrives and it doesn't matter which one it is. Does it make the most sense to start with gasoline?
- 2) Can Lamborghini request extra preconditioning between the switch from E10/E85 to gasoline to purge the ethanol from the fuel system?
- 3) If evap test confirmation is included, will both gasoline and E10 tests be performed at the EPA?

**Ex. 6**

Please Cc Bill Rodgers (William.rodgers@vw.com) on your reply.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 11/4/2011 11:07:37 AM  
**Subject:** Re: Audi Q5 Hybrid  
[CHUB-Q5A\\_11-2-11.pdf](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Good morning Bill,

Please find enclosed the Laboratory Test Data for CHUB-Q5A. If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Cc:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 11/01/2011 03:48 PM  
**Subject:** Audi Q5 Hybrid

Hello Vince,

As discussed, I have attached the Q5 Hybrid instructions.

PS

I also just spoke to Jim about the new test start time. I will have my colleague Andy Kramer standing by in Ann Arbor before the Noon start time, probably by 10:30AM.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States


office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

[attachment "EPA QA Revised Starting.ppt" deleted by Vincent Mazaitis/AA/USEPA/US]

CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0324-003			Vehicle ID: CHUB-Q5A				
	<b>Test Information</b>		Test Date: 11/2/2011		MFR Name: AUDI		
	Key Start / Hot Soak: 12:33:47 / 09:53				MFR Codes: 640 ADX		
	Fuel Container ID: F00023				Config #: 00		
	Fuel Type: 61 Tier 2 Cert Test Fuel				Transmission: S		
	Test Procedure: 21.04 Fed Fuel 2-day Exhaust (CAN LOAD)				Shift Schedule: A09980005		
	Calculation Method: Gasoline				Beginning Odometer: 004768.0 MI		
	Pretest Remarks:				Drive Schedule: flp4bag		
				Soak Period: 19.6 hours			
<b>Bag Data</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
<b>Phase 1</b>							
Sample		5.913	30.974	1.644	0.950	2.627	
Ambient		2.465	0.000	0.014	0.044	1.978	
Net Concentration		3.623	30.974	1.631	0.909	0.790	2.687
Remarks:							
<b>Phase 2</b>							
Sample		2.477	12.248	0.474	0.503	1.934	
Ambient		2.480	0.000	0.013	0.044	1.977	
Net Concentration		0.090	12.248	0.461	0.461	0.031	0.054
Remarks:							
<b>Phase 3</b>							
Sample		2.666	18.774	0.653	0.786	2.007	
Ambient		2.472	0.000	0.012	0.044	1.969	
Net Concentration		0.339	18.774	0.642	0.745	0.153	0.157
Remarks:							
<b>Phase 4</b>							
Sample		2.530	9.405	0.480	0.480	1.942	
Ambient		2.508	0.000	0.011	0.044	1.971	
Net Concentration		0.113	9.405	0.469	0.438	0.042	0.063
Remarks:							
<b>Results</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.046	0.788	0.061	363.6	0.012	0.034 / 0.035
Phase 2		0.002	0.495	0.028	292.9	0.001	0.001 / 0.001
Phase 3		0.004	0.478	0.024	298.0	0.002	0.002 / 0.002
Phase 4		0.002	0.379	0.028	277.0	0.001	0.001 / 0.001
Weighted		0.01171	0.51684	0.03381	304.271	0.00345	(NMOG=1.04xNMHC) 0.0082 / 0.0085
<b>Fuel Economy</b>							
		<u>Gasoline MPG</u>			<u>Dyno Settings</u>		
Phase 1		24.39			Dyno #: D329 - AWD		
Phase 2		30.32			Inertia: 4750		
Phase 3		29.81			EPA Set Co A: -23.3		
Phase 4		32.08			EPA Set Co B: 0.1781		
		<u>1% SOC Limit</u>	<u>Act SOC A-hr</u>	<u>Sys Nom Volts</u>	<u>Charge State</u>	EPA Set Co C: 0.02292	
		0.6480	-0.2108	264.0	Pass		
Weighted		29.21			Emiss-Bench: Mexa 7200sle		

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-003

Vehicle ID: CHUB-Q5A

## Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.164	2.827	0.221	1304.4	0.041	0.121	1.185
Phase 2	0.007	1.907	0.106	1127.9	0.003	0.004	
Phase 3	0.015	1.718	0.087	1071.2	0.008	0.007	
Phase 4	0.009	1.463	0.108	1069.8	0.004	0.005	

## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.20	29.19	29.18	29.17
Avg Cell Temp (degF)	75.62	75.46	75.34	75.21
Dew Point (degF)	48.71	48.47	48.68	48.41
Specific Humidity (grains/lbm)	52.29	51.81	52.24	51.74
NOx Corr Factor	0.9035	0.9017	0.9034	0.9014
CO2 Dilution Factor	14.049	26.554	17.000	27.86
CFV Vmix (scf @68F)	2768.37	4722.96	2775.50	4718.36
CVS Flow Rate Avg (scfm)	327.42	323.97	328.01	325.55
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	507.30	869.70	507.70	869.59
Distance (miles)	3.587	3.851	3.595	3.862
Bag Analysis Time (secs)	143.8	148.7	143.8	155.2

## MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0163	0.51	0.03	306	0	0.0136

Odometer  
4448 M

MPG  
29

MPG is -0.72 % lower than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

CERT  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-001

Vehicle ID: CHUB-Q5A

## Test Information



Test Date: 11/2/2011  
Key Start: 14:08:29  
Fuel Container ID: F00023  
Fuel Type: 61 Tier 2 Cert Test Fuel  
Test Procedure: 03 HWFET (hwfetest\_prep\_hwfet)  
Calculation Method: Gasoline  
Pretest Remarks:

MFR Name: AUDI  
MFR Codes: 640 ADX  
Config #: 00  
Transmission: S  
Shift Schedule: A09980011  
Beginning Odometer: 004783.0 MI  
Drive Schedule: hwfetest\_prep\_hwfet

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	4.285	31.477	0.417	1.216	2.402	
Ambient	2.508	0.000	0.004	0.043	1.971	
Net Concentration	2.005	31.477	0.413	1.176	0.611	1.281

Remarks:

### Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.013	0.419	0.008	246.1	0.005	0.008 / 0.009	36.157

(NMOG=1.04xNMHC)

## Fuel Economy

Gasoline MPG  
Phase 1 36.07

## Dyno Settings

Dyno #: D329 - AWD

Inertia: 4750

EPA Set Co A: -23.3

EPA Set Co B: 0.1781

EPA Set Co C: 0.02292

1% SOC Limit  
0.3603

Act SOC A-hr  
0.0686

Sys Nom Volts  
264.0

Charge State  
Pass

Emiss-Bench: Mexa 7200sie

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-001

Vehicle ID: CHUB-Q5A

## Results



	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
Phase 1	(grams) 0.135	(grams) 4.290	(grams) 0.084	(grams) 2519.5	(grams) 0.048	(grams) 0.086	1.185

## Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.14			
Avg Cell Temp (degF)	75.52			
Dew Point (degF)	48.61			
Specific Humidity (grains/lbm)	52.18			
NOx Corr Factor	0.9031			
CO2 Dilution Factor	10.991			
CFV Vmix (scf @68F)	4134.26			

CVS Flow Rate Avg (scfm) 324.26

Fan Placement: One Fan - Up - Front  
 Phase Time (secs) 765.01  
 Distance (miles) 10.236  
 Bag Analysis Time (secs) 145.2

## MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0125	0.25	0.005	223	0	0.0095

Odometer  
4301 M

MPG  
39.8

MPG is 10.33 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8  
 Fuel: 61 Tier 2 Cert Gasoline



CERT

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-004

Vehicle ID: CHUB-Q5A

### Test Information



Test Date: 11/2/2011  
Key Start: 14:50:24  
Fuel Container ID: F00023  
Fuel Type: 61 Tier 2 Cert Test Fuel  
Test Procedure: 89 us062bag (us06warmup\_2bagus06)  
Calculation Method: Gasoline  
Pretest Remarks:

MFR Name: AUDI  
MFR Codes: 640 ADX  
Config #: 00  
Transmission: S  
Shift Schedule: A09980041  
Beginning Odometer: 004803.0 MI  
Drive Schedule: us06warmup\_2bagus06

### Bag Data

#### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	4.005	110.854	0.857	0.907	2.250	
Ambient	2.519	0.000	0.008	0.043	1.967	
Net Concentration	1.658	110.854	0.850	0.866	0.417	1.164

Remarks:

#### Phase 2

Sample	3.281	50.480	0.752	1.121	2.024	
Ambient	2.543	0.000	0.007	0.044	1.967	
Net Concentration	0.952	50.480	0.746	1.080	0.222	0.689

Remarks:

#### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

#### Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

### Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.033	4.489	0.051	551.3	0.010	0.023 / 0.024	15.982
Phase 2	0.008	0.895	0.020	300.9	0.002	0.006 / 0.006	29.517
Composite	0.01388	1.69149	0.02666	356.447	0.00390	(NMOG=1.04xNMHC) 0.0099 / 0.0103	

### Fuel Economy

	Gasoline MPG	1% SOC Limit	Act SOC A-hr	Sys Nom Volts	Charge State	Dyno Settings	Dyno #
Phase 1	15.94						D329 - AWD
Phase 2	29.45						Inertia: 4750
							EPA Set Co A: -23.3
							EPA Set Co B: 0.1781
							EPA Set Co C: 0.02292
Composite	24.82	0.4090	0.106	264.0	Pass		Emiss-Bench: Mexa 7200sle

v101208 - d329 EPAVDAEm111102142821

Page 1 of 2

Print Time 03-Nov-2011 15:47

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data  
Test Number: 2011-0324-004

Vehicle ID: CHUB-Q5A

## Results



	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.059	7.950	0.091	976.4	0.017	0.041	1.185
Phase 2	0.052	5.564	0.122	1871.4	0.014	0.038	

## Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.13	29.13		
Avg Cell Temp (degF)	75.06	74.87		
Dew Point (degF)	48.85	48.86		
Specific Humidity (grains/lbm)	52.68	52.69		
NOx Corr Factor	0.9051	0.9051		
CO2 Dilution Factor	14.592	11.899		
CFV Vmix (scf @68F)	2175.30	3342.90		
CVS Flow Rate Avg (scfm)	550.24	549.52		

Fan Placement: US06 Only - One Large Fan - Up - Front				
Phase Time (secs)	130.00	365.00	107.21	
Distance (miles)	1.771	6.218		
Bag Analysis Time (secs)	150.2	402.3		

## MFR Test Results

for Procedure 90 US06

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0139	0.63	0.015	322	0	0.0097

<u>Odometer</u>	<u>MPG</u>
4321 M	27.5

MPG is 10.78 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8  
Fuel: 61 Tier 2 Cert Gasoline

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Fri 11/4/2011 1:42:22 PM  
**Subject:** RE: Audi Q5 Hybrid  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Vince,

Can you send me your load determination sheet for this vehicle?

Thanks,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, November 04, 2011 7:08 AM

To: Rodgers, William  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: Re: Audi Q5 Hybrid

Good morning Bill,

Please find enclosed the Laboratory Test Data for CHUB-Q5A. If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 11/01/2011 03:48 PM  
Subject: Audi Q5 Hybrid

Hello Vince,

As discussed, I have attached the Q5 Hybrid instructions.

PS

I also just spoke to Jim about the new test start time. I will have my colleague Andy Kramer standing by in Ann Arbor before the Noon start time, probably by 10:30AM.

Regards,

Bill Rodgers

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

[attachment "EPA QA Revised Starting.ppt" deleted by Vincent Mazaitis/AA/USEPA/US]

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 11/4/2011 1:44:25 PM  
**Subject:** RE: Audi Q5 Hybrid  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Bill,

It will be next week. I'll get it Monday and send it.

Have a nice weekend!

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 11/04/2011 09:42 AM  
Subject: RE: Audi Q5 Hybrid

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 11/7/2011 4:28:42 PM  
**Subject:** 2013 Certification Preview Letter  
CBI DVWXV COMMON LTR CPP R00.PDF  
william.rodgers@vw.com

As discussed.

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
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william.rodgers@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 11/7/2011 6:53:42 PM  
**Subject:** RE: 2013 Certification Preview Letter

Dennis Reineke will call you on this. It's clearly not a US car but he has the means to track it down.

I think it's a "old-style" Beetle from Mexico but I'm not 100% sure. I've heard of these being imported in pieces and later titled as kit cars somehow.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, November 07, 2011 12:47 PM  
To: Rodgers, William  
Subject: Re: 2013 Certification Preview Letter

Bill, Illinois' State I/M testing has a VW that appears to have no OBD2 results. ITs listed as a 1997 Volkswagen. They say it is a Beetle, possibly imported from Mexico. Can you look up the VIN # and see what it is? Since its possibily from Mexico , I'm wondering if its a New or Old beetle.

vin **Ex. 6**

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Mon 11/7/2011 8:05:11 PM  
**Subject:** RE: Audi Q5 Hybrid  
[CHUB-Q5A\\_Roadload\\_Derivation\\_11-1-11.pdf](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Bill,

Please find enclosed the Road Load Derivation for CHUB-Q5A.

If you have any questions or concerns, please contact me.

Thanks,

Vince Mazaitis

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Cc:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 11/04/2011 09:42 AM  
**Subject:** RE: Audi Q5 Hybrid

Hi Vince,

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Bill Rodgers

Emissions Certification Specialist

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To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 11/01/2011 03:48 PM  
Subject: Audi Q5 Hybrid

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I also just spoke to Jim about the new test start time. I will have my colleague Andy Kramer standing by in Ann Arbor before the Noon start time, probably by 10:30AM.

Regards,

Bill Rodgers

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

[attachment "EPA QA Revised Starting.ppt" deleted by Vincent Mazaitis/AA/USEPA/US]

d329  
65 Plymouth Road  
Ann Arbor, MI 48105  
734-214-4200

**Dyno-specific data:**

Dyno No.: d329  
Dyno name: 4 WD Cell 329  
Factory number: NVFEL

Print date / time: 11/1/2011 / 14:35

Roadload derivation - Test ID: 633

**Roadload derivation:****Settings:****Ambient data:**

PL ID: 419 / 437

Date: 11/01/2011

Time: 14:09:48

Measured temperature [°F]: 75.2

Measured air pressure [psi]: 14.301

**System settings:**

Reference temperature [°F]: 68.0

Reference air pressure [psi]: 14.504

**Test settings:**

Axle mode: 4WD

Log file:

Adjustment [%]: 100.00

Max. Runs: 20

Verification: 2

**Vehicle information: Vehicle number CHUB-Q5A**

Weight [lbs]: 4750

Rot. 2WD [lbs]: 70

Rot. 4WD [lbs]: 138

Drive : 4WD

Rotational direction : Forward

Country : US

**Setting Road:**

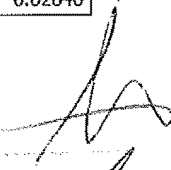
No.	Vmax [mph]	Vmin [mph]	T-target [s]	F-target [lbf]	Error-F [lbf]
1	70.00	60.00	14.68	152.19	2.00
2	60.00	50.00	18.58	120.28	2.00
3	50.00	40.00	23.75	94.05	2.00
4	40.00	30.00	30.36	73.50	2.00
5	30.00	20.00	37.98	58.63	2.00
6	20.00	10.00	44.91	49.44	2.00

**Setting Dyno:****Coefficients:**


Inertia [lbs]	4750
A <sub>s</sub> [lbf]	23.16
B <sub>s</sub> [lbf/mph]	-0.0434
C <sub>s</sub> [lbf/mph <sup>2</sup> ]	0.02840

**Coefficients:**

Inertia [lbs]	4888
A <sub>r</sub> [lbf]	46.31
B <sub>r</sub> [lbf/mph]	-0.2170
C <sub>r</sub> [lbf/mph <sup>2</sup> ]	0.02840

Signed by: 

Date: 11/1/11

Verified by: 

Date: 11-1-11

**Comments:**

324005

ECDM 48105

d329  
 65 Plymouth Road  
 Ann Arbor, MI 48105  
 734-214-4200

**Dyno-specific data:**  
 Dyno No.: d329  
 Dyno name: 4 WD Cell 329  
 Factory number: NVFEL

Roadload derivation - Test ID: 633

Print date / time: 11/1/2011 / 14:35

## Overview:

Test status: Success

Run No.	Category	A [lbf]	B [lbf/mph]	C [lbf/mph <sup>2</sup> ]	Max. error	
					v [mph]	[lbf]
CD: 1	meas	87.89	0.2912	0.02626	69.94	*-66.66
cfm: 0	veh	64.73	0.3346	-0.00214		
	next	-18.42	-0.5516	0.03054	10.00	*5.97
CD: 2	meas	39.76	-0.1588	0.02840		
cfm: 0	veh	58.18	0.3928	-0.00214		
	next	-11.87	-0.6098	0.03054	48.76	*6.16
CD: 3	meas	54.87	-0.8206	0.03459		
cfm: 0	veh	66.74	-0.2108	0.00404		
	next	-20.43	-0.0062	0.02436	64.36	*3.06
CD: 4	meas	49.18	-0.4013	0.02983		
cfm: 0	veh	69.61	-0.3951	0.00518		
	next	-23.30	0.1781	0.02292	10.00	0.70
CD: 5	meas	45.44	-0.1997	0.02837		
cfm: 0	veh	68.74	-0.3778	0.00544		
	next	-23.30	0.1781	0.02292	38.38	0.73
CD: 6	meas	46.39	-0.2591	0.02895		
cfm: 1	veh	69.68	-0.4372	0.00603		
	next	-23.30	0.1781	0.02292	10.00	1.07
CD: 7	meas	45.03	-0.1941	0.02826		
cfm: 2	veh	68.33	-0.3722	0.00534		
	next	-23.30	0.1781	0.02292		

ECDM 48iv..

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Reineke, Dennis"  
**Sent:** Mon 11/7/2011 9:23:29 PM  
**Subject:** RE:

Hello Jim,

The VIN Illinois has provided describes a 1997 Classic Beetle (old). Mexican produced Beetles were never imported for sale by Volkswagen Group of America, Inc. This vehicles as produced in Mexico does not meet U.S. emissions or safety standard for the 197 model year.

The VIN breaks down as follows:

3 VW - WMI - Volkswagen de Mexico

ZZZ11 - VDS - ZZZ are filler characters, 11 represents the model type = old, classic or air cooled Beetle

V - MY - 1997

M - Plant - Pueblo

Please contact me or Bill Rodgers if you have additional questions.

Dennis E. Reineke  
Certification Specialist  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road

Auburn Hills, MI 48326  
USA  
Phone: +1-248-754-4215  
Fax : +1-248-754-4207  
Mail To: Dennis.Reineke@vw.com



From: Rodgers, William  
Sent: Monday, November 07, 2011 1:48 PM  
To: Reineke, Dennis  
Subject: FW:

Dennis,

Can this VIN be put into ETKA?

Model 113 does not ring a bell with me. Looks like a Mexican Type I Beetle?

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, November 07, 2011 12:47 PM  
To: Rodgers, William  
Subject: Re: 2013 Certification Preview Letter

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vin **Ex. 6**

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snyder.jim@epa.gov

**To:** Vincent Mazaitis/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 11/8/2011 12:32:36 PM  
**Subject:** RE: Audi Q5 Hybrid  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
<mailto:Mazaitis.Vincent@epamail.epa.gov>  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks guys.

Please also, let us know what your schedule for this week's testing is.

Regards,

Bill Rodgers

Emissions Certification Specialist

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From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Monday, November 07, 2011 3:05 PM

To: Rodgers, William  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: RE: Audi Q5 Hybrid

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

[attachment "EPA QA Revised Starting.ppt" deleted by Vincent Mazaitis/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 11/15/2011 2:00:45 PM  
**Subject:** RE: Audi testing

Thanks Jim,

Our resident Audi Engineer will be there at 7AM. His name is Marcos Marques –

Ex. 6

Regards,

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, November 15, 2011 8:19 AM  
To: Rodgers, William  
Subject: Audi testing

The Audi is scheduled for a 4 bag FTP, hwy and US06 on Thursday, after the new road load derivation.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 11/15/2011 2:44:40 PM  
**Subject:** RE: Audi testing  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Vince,

As discussed, please send us the Audi Q5 Hybrid load derivation after its completed on Wednesday.

We will have an Audi Engineer at EPA on Thursday morning by 7AM to witness the start of the exhaust tests. His name is Marcos Marques - Ex. 6

Shall I have him ask for you at Security once he arrives?

Regards,

Bill Rodgers

Emissions Certification Specialist

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Sent: Tuesday, November 15, 2011 8:19 AM  
To: Rodgers, William  
Subject: Audi testing

The Audi is scheduled for a 4 bag FTP, hwy and US06 on Thursday, after the new road load derivation.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/15/2011 4:05:31 PM  
**Subject:** RE: Audi testing  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Bill,

Thanks for the note. I'll send the road load derivation as soon as the lab makes it available. It's usually available with the Lab test results.

Yes, have Marcos give my name to Security. I'm usually here by 6:30 a.m. I'll call Marcos if there is a change.

Thanks Bill,

Vince Mazaitis

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Cc:** Jim Snyder/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 11/15/2011 09:44 AM  
**Subject:** RE: Audi testing

Hello Vince,

As discussed, please send us the Audi Q5 Hybrid load derivation after its completed on Wednesday.

We will have an Audi Engineer at EPA on Thursday morning by 7AM to witness the start of the exhaust tests. His name is Marcos Marques - Ex. 6

Shall I have him ask for you at Security once he arrives?

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, November 15, 2011 8:19 AM  
To: Rodgers, William  
Subject: Audi testing

The Audi is scheduled for a 4 bag FTP, hwy and US06 on Thursday, after the new road load derivation.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 11/16/2011 4:54:17 PM  
**Subject:** VW Group Running Change CV2.5259\_03\_11  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I have uploaded several running changes related to the addition of Beetle Convertible FEDVs to four 2012 model year test groups (listed below). Certificate requests for each test group have also been submitted to allow the new carline to be added to the Certificates.

Test Groups:

CVWXV02.5259

CVWXV02.5U35

CVWXV02.03PA

CADXJ02.03UA

In one case, I was unable to process a new Test Group input file in Verify due to Verify release 9 issues related to EPA confirmed test results. A Verify help desk ticket has been opened to have EPA test results resubmitted with CREE/Opt-CREE values. As the result, the following Application revision was submitted without an updated Section 7 CSI to reflect the added Beetle Convertible. This application will be corrected in the Update coming soon, assuming the EPA test issues are resolved by that time. I hope this will not delay the approval of the revised certificate for this test group. Please let me know if you have any questions or concerns.

Application to be revised:

CBI\_CVWXV02.5259\_APP\_INI\_R03.PDF

Regards,

Bill Rodgers

Emissions Certification Specialist

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office (248) 754-4219

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William"  
[William.Rodgers@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 11/17/2011 10:42:22 PM  
**Subject:** Re: 2nd RLD of 2012 Q5 HEV

I spoke too soon. The new coefficients aren't really better when totalled. Hot test results are in Verify.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: "Rodgers, William" <William.Rodgers@vw.com>  
Cc: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 11/17/2011 04:39 PM  
Subject: 2nd RLD of 2012 Q5 HEV

Here's the RLD results. I circled the final set coefficients. The A and B look a lot closer to Audi's numbers. This should help correlation.

[attachment "2012 Q5 HEV 2nd RLD.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "2012 Q5 HEV 2nd RLD pg2.pdf" deleted by Jim Snyder/AA/USEPA/US]

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 11/17/2011 11:34:43 PM  
**Subject:** Re: VW Group RE: Question from Lamborghini  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

I happened to talk to Ben about E85 testing and he said he prefers flex-fuel vehicles arrive with E85 first so they don't need as much e85 fuel to do the switchover.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William" <William.Rodgers@vw.com>  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 10/27/2011 06:05 PM  
**Subject:** Re: VW Group RE: Question from Lamborghini

See my answers in red. **Ex. 6**

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 10/27/2011 08:49 AM  
**Subject:** VW Group RE: Question from Lamborghini

Jim,  
One last item for today. I am following up for Bob Hart **Ex. 6** Have you  
had the chance to look at the following questions?  
Thanks,  
Bill

From: Hart, Robert (VWoA)  
Sent: Monday, October 24, 2011 9:55 AM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: Question from Lamborghini

Hello Jim,

Lamborghini's first flex-fuel car is scheduled for MY 2013. They have some questions since they have no previous experience with flex-fuel vehicle confirmatory tests at the EPA.

Due to the number of possible fuel changes - between gasoline, E10 and E85 fuels, Lamborghini would like to know the order tests are performed at the EPA when a flex-fuel car is tested with evap tests included.

1) I think you told me that testing will start with whatever fuel type is in the flex-fuel vehicle when it arrives and it doesn't matter which one it is. Does it make the most sense to start with gasoline? I believe Ben Haynes in the lab has a practical preference for starting with gasoline first to minimize the E85 we have to drain and scrap.

2) Can Lamborghini request extra preconditioning between the switch from E10/E85 to gasoline to purge the ethanol from the fuel system? Yes.

3) If evap test confirmation is included, will both gasoline and E10 tests be performed at the EPA? We currently don't Evap test with E10 but plan to in the future with the new shed. Definitely not in this round of testing if its in the next 3 months.

**Ex. 6**

Please Cc Bill Rodgers (William.rodgers@vw.com) on your reply.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 11/18/2011 12:04:54 PM  
**Subject:** CHUB-Q5A Hwy & US06 Laboratory Test Data  
[CHUB-Q5A\\_11-17-11.pdf](#)

Hello Bill,


Please find enclosed the Hwy and US06 Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Best regards,

Vince Mazaitis



08125

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0324-007				Vehicle ID: CHUB-Q5A			
		Test Date: 11/17/2011		MFR Name: AUDI			
		Key Start: 09:25:43		MFR Codes: 640		ADX	
		Fuel Container ID: F00023		Config #: 00			
		Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: S			
		Test Procedure: 03 HWFET (hwfetprep_hwfet)		Shift Schedule: A09980011			
		Calculation Method: Gasoline		Beginning Odometer: 004878.0 MI			
		Pretest Remarks:		Drive Schedule: hwfet_hwfet			
<hr/>							
<b>Bag Data</b>		<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NonMeth HC</b>
<b>Phase 1</b>		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Sample		3.906	39.014	0.304	1.276	2.340	
Ambient		2.532	0.195	0.012	0.045	1.958	
Net Concentration		1.616	38.837	0.293	1.235	0.569	0.941
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<hr/>							
<b>Results</b>		<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NMHC / NMOG</b>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.011	0.516	0.006	257.9	0.004	0.006 / 0.006
		(NMOG=1.04xNMHC)					
<hr/>							
<b>Fuel Economy</b>		<b>Gasoline MPG</b>			<b>Dyno Settings</b>		
Phase 1		34.41			Dyno #: D329 - AWD		
					Inertia: 4750		
					EPA Set Co A: -9.61		
					EPA Set Co B: -0.164		
					EPA Set Co C: 0.02573		
		<b>1% SOC Limit</b>	<b>Act SOC A-hr</b>	<b>Sys Nom Volts</b>	<b>Charge State</b>		
		0.3782	0.0005	264.0	Pass		
					Emiss-Bench: Mexa 7200sle		
<hr/>							
v101208 - d329 EPAVDAEm111117085526				Page 1 of 2		Print Time 17-Nov-2011 14:12	

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-007

Vehicle ID: CHUB-Q5A

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.109	5.284	0.059	2641.2	0.044	0.063	1.185

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.08			
Avg Cell Temp (degF)	75.79			
Dew Point (degF)	47.93			
Specific Humidity (grains/lbm)	50.97			
NOx Corr Factor	0.8985			
CO2 Dilution Factor	10.469			
CFV Vmix (scf @68F)	4126.85			

CVS Flow Rate Avg (scfm) 323.67

Fan Placement: One Fan - Up - Front

Phase Time (secs)	765.00
Distance (miles)	10.240
Bag Analysis Time (secs)	144.8

### MFR Test Results

for Procedure 3 HWFE

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0125	0.25	0.005	223	0	0.0095

Odometer  
4301 M


MPG  
39.8

MPG is 15.66 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8  
Fuel: 61 Tier 2 Cert Gasoline

C8125

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0324-009			Vehicle ID: CHUB-Q5A				
<b>Test Information</b>							
	Test Date: 11/17/2011		MFR Name: AUDI				
	Key Start: 10:19:29		MFR Codes: 640 ADX				
	Fuel Container ID: F00023		Config #: 00				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: S				
	Test Procedure: 89 us062bag (us06warmup_2bagus06)		Shift Schedule: A09980041				
	Calculation Method: Gasoline		Beginning Odometer: 004898.0 MI				
Pretest Remarks:			Drive Schedule: us06warmup_2bagus06				
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	3.829	84.307	0.637	0.873	2.197		
Ambient	2.534	0.000	0.010	0.043	1.924		
Net Concentration	1.462	84.307	0.627	0.833	0.400	0.987	
Remarks:							
<b>Phase 2</b>							
Sample	3.131	40.744	1.413	1.179	2.031		
Ambient	2.559	0.000	0.010	0.044	1.929		
Net Concentration	0.797	40.744	1.403	1.139	0.272	0.475	
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.030	3.444	0.038	534.8	0.009	0.020 / 0.021	16.519
Phase 2	0.007	0.724	0.037	318.1	0.003	0.004 / 0.004	27.957
Composite	0.01200	1.32429	0.03714	365.934	0.00423	(NMOG=1.04xNMHC) 0.0077 / 0.0080	
<b>Fuel Economy</b>	<u>Gasoline MPG</u>	<u>Dyno Settings</u>				<u>Dyno #:</u> D329 - AWD	
Phase 1	16.48					Inertia: 4750	
Phase 2	27.89					EPA Set Co A: -9.61	
						EPA Set Co B: -0.164	
						EPA Set Co C: 0.02573	
		<u>1% SOC Limit</u>	<u>Act SOC A-hr</u>	<u>Sys Nom Volts</u>	<u>Charge State</u>	Emiss-Bench: Mexa 7200ste	
		0.4200	0.0212	264.0	Pass		
Composite	24.19						
v101208 - d329 EPAVDAEm111117094938 Page 1 of 2 Print Time 17-Nov-2011 14:14							

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-009

Vehicle ID: CHUB-Q5A

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.052	6.078	0.067	943.9	0.017	0.035	1.185
Phase 2	0.044	4.511	0.230	1981.9	0.017	0.026	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.08	29.08		
Avg Cell Temp (degF)	75.13	75.17		
Dew Point (degF)	48.00	48.49		
Specific Humidity (grains/lbm)	51.10	52.07		
NOx Corr Factor	0.8990	0.9027		
CO2 Dilution Factor	15.190	11.322		
CFV Vmix (scf @68F)	2186.67	3357.77		

CVS Flow Rate Avg (scfm) 552.89 551.96

Fan Placement: US06 Only - One Large Fan - Up - Front

Phase Time (secs)	130.00	365.00	107.30
Distance (miles)	1.765	6.231	
Bag Analysis Time (secs)	149.8	402.0	

### MFR Test Results

for Procedure 90 US06

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0139	0.63	0.015	322	0	0.0097

Odometer  
4321 M

MPG  
27.5

MPG is 13.68 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8

Fuel: 61 Tier 2 Cert Gasoline

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Fri 11/18/2011 3:26:25 PM  
**Subject:** RE: CHUB-Q5A Hwy & US06 Laboratory Test Data

Hello Vince,

Can you confirm whether the hood latch was in place during the 2nd load determination?

Thanks,

Bill

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, November 18, 2011 7:05 AM  
To: Rodgers, William  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: CHUB-Q5A Hwy & US06 Laboratory Test Data

Hello Bill,

Please find enclosed the Hwy and US06 Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Best regards,

Vince Mazaitis

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 11/21/2011 10:17:52 PM  
**Subject:** Verify errors for EPA tests  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

<TransactionStatusDetails>

<TransactionStatusIdentifier>REJECTED</TransactionStatusIdentifier>

<TransactionMessageText>LD-CERT-TG-BR190 - If there exists any Official Test Number(s), then each of the Test Number(s) must be entered as an Exhaust Test Number (TG-202.5). (Test Group Fuel (TG-217.1): G)</TransactionMessageText>

<TransactionMessageText>LD-CERT-TG-BR189 - If the Model Year (TG-6) is greater than or equal to 2012 and if the Exhaust Test Number (TG-202.5) has a Test 5-Cycle Category (TI-45) of 'FTP75' or 'HWY', then that Exhaust Test Number (TG-202.5) must have a Rounded Adjusted CREE (TI-19.4) or Rounded Adjusted OPT-CREE (TI-19.8). The test number specified will need to be resubmitted to allow Verify to perform this calculation. (Test Number: BVWX91000667)</TransactionMessageText>

<TransactionMessageText>LD-CERT-TG-BR189 - If the Model Year (TG-6) is greater than or equal to 2012 and if the Exhaust Test Number (TG-202.5) has a Test 5-Cycle Category (TI-45) of 'FTP75' or 'HWY', then that Exhaust Test Number (TG-202.5) must have a Rounded Adjusted CREE (TI-19.4) or Rounded Adjusted OPT-CREE (TI-19.8). The test number specified will need to be resubmitted to allow Verify to perform this calculation. (Test Number: BVWX91000666)</TransactionMessageText>

</TransactionStatusDetails>

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA; [Ex. 4 - CBI@csc.com];  
[Ex. 4 - CBI@csc.com>]; [Ex. 7@vw.com]; [Ex. 7  
[Ex. 7@vw.com]; [Ex. 7@vw.com]; [Ex. 7  
[Ex. 7@vw.com]  
**From:** [Ex. 7]  
**Sent:** Wed 11/23/2011 1:33:02 PM  
**Subject:** VW Group- EPA test re-processing  
[Ex. 7@vw.com]

Hello Bob,

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

BVWX91000666

BVWX91000667

BVWX91000842

BVWX91000820

9VWX09009736

9VWX09009737

CVWX91000985

CVWX91000960

CADX91000966

CADX91000967

CADX91000988



CADX91000951

BBEX91000679

BBEX91000680

BBEX91000783

BBEX91000758

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

**Ex. 7**

**Ex. 7** @vw.com

**To:** [Ex. 7]@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; [Ex. 7]  
[Ex. 7]@vw.com]; [Ex. 7]@vw.com]; [Ex. 7]  
[Ex. 7]@vw.com]; [Ex. 7]@vw.com]; [Ex. 4 - CBI]@csc.com[]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US  
**Sent:** Wed 11/23/2011 6:13:23 PM  
**Subject:** Re: VW Group- EPA test re-processing  
[Ex. 7]@vw.com

William,

I have pulled copies of each of the tests specified and tried to re-submit them.

I can't re-submit BVWX91000666 because test group CVWXV02.5259 is locked  
I cant re-submit BVWX91000667 because test group CVWXV02.5259 is locked

I can't re-submit BVWX91000842 because test groups BPRXT03.0CHD and CPRXT03.0CHD are locked  
I can't re-submit BVWX91000820 because test groups BPRXT03.0CHD and CPRXT03.0CHD are locked

CVWX91000985 has been re-submitted, accepted, and CREE is now calculated  
CVWX91000960 has been re-submitted, accepted, and CREE is now calculated

CADX91000966 has been re-submitted, accepted, and CREE is now calculated  
CADX91000967 has been re-submitted, accepted, and CREE is now calculated

CADX91000988 has been re-submitted, accepted, and CREE is now calculated  
CADX91000951 has been re-submitted, accepted, and CREE is now calculated

I can't re-submit BBEX91000679 because test group CBEXV06.0501 is locked  
I can't re-submit BBEX91000680 because test group CBEXV06.0501 is locked

BBEX91000783 has been re-submitted, accepted, and CREE is now calculated  
BBEX91000758 has been re-submitted, accepted, and CREE is now calculated

If you can get the the 4 testgroups unlocked within the next hour, I will try to get them re-submitted again this afternoon.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

**From:** [Ex. 7]@vw.com>  
**To:** Robert Peavyhouse/AA/USEPA/US@EPA  
**Cc:** Jim Snyder/AA/USEPA/US@EPA; [Ex. 4 - CBI]@csc.com>; [Ex. 7]  
[Ex. 7]@vw.com>; [Ex. 7]@vw.com>; [Ex. 7]  
[Ex. 7]@vw.com>

Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello Bob,

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

BVWX91000666  
BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679  
BBEX91000680

BBEX91000783  
BBEX91000758

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

**Ex. 7**

**Ex. 7** @vw.com

**To:** Robert Peavyhouse/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:** [Ex. 7]@vw.com]; [Ex. 7]  
[Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Wed 11/23/2011 7:03:12 PM  
**Subject:** RE: VW Group- EPA test re-processing  
[Ex. 7]@vw.com  
<http://www.epa.gov/nvfe/>  
[Ex. 7]@vw.com

Hello Bob and Jim,

1) The active Certification request for test group CVWXV02.5259 will have to be denied by EPA. It can wait until Monday if need be.

Error: There cannot be a pending certificate request for this Test Group (CR-2) and Evaporative/Refueling Family (CR-3) in the system. The certificate must either be issued or denied before a new certificate request with CR-0.5 (Process Code) equal to 'N' (New) can be submitted.

2) I've asked our Porsche contact to unlock their certificates you referenced below BPRXT03.0CHD and CPRXT03.0CHD. They use our VW Touareg Hybrid tests for their Cayenne Hybrid. We will let you know when that happens.

3) CBEXV06.0501 has now been unlocked.

Thanks for the help,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

**Ex. 7**

**Ex. 7** @vw.com

From: Peavyhouse.Robert@epamail.epa.gov [mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Wednesday, November 23, 2011 1:13 PM  
To: **Ex. 7**  
Cc: Snyder.Jim@epamail.epa.gov; **Ex. 7**; **Ex. 4 - CBI**@csc.com  
Subject: Re: VW Group- EPA test re-processing

**Ex. 7**

I have pulled copies of each of the tests specified and tried to re-submit them.

I can't re-submit BVWX91000666 because test group CVWXV02.5259 is locked  
I cant re-submit BVWX91000667 because test group CVWXV02.5259 is locked

I can't re-submit BVWX91000842 because test groups BPRXT03.0CHD and CPRXT03.0CHD are locked  
I can't re-submit BVWX91000820 because test groups BPRXT03.0CHD and CPRXT03.0CHD are locked

CVWX91000985 has been re-submitted, accepted, and CREE is now calculated  
CVWX91000960 has been re-submitted, accepted, and CREE is now calculated

CADX91000966 has been re-submitted, accepted, and CREE is now calculated  
CADX91000967 has been re-submitted, accepted, and CREE is now calculated

CADX91000988 has been re-submitted, accepted, and CREE is now calculated  
CADX91000951 has been re-submitted, accepted, and CREE is now calculated

I can't re-submit BBEX91000679 because test group CBEXV06.0501 is locked  
I can't re-submit BBEX91000680 because test group CBEXV06.0501 is locked

BBEX91000783 has been re-submitted, accepted, and CREE is now calculated  
BBEX91000758 has been re-submitted, accepted, and CREE is now calculated

If you can get the the 4 testgroups unlocked within the next hour, I will try to get them re-submitted again this afternoon.

Robert Peavyhouse

Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: http://www.epa.gov/nvfel/

From: [Ex. 7]@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, [Ex. 4 - CBI]@csc.com>, [Ex. 7]@vw.com>, [Ex. 7]@vw.com>, [Ex. 7]@vw.com>  
Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello Bob,

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

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BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679  
BBEX91000680

BBEX91000783  
BBEX91000758

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

**Ex. 7**

**Ex. 7** @vw.com

**To:** [Ex. 7]@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US  
**Sent:** Wed 11/23/2011 7:16:06 PM  
**Subject:** RE: VW Group- EPA test re-processing

[Ex. 7]@vw.com  
<http://www.epa.gov/nvfel/>

[Ex. 7]@vw.com

**Ex. 7**

BBEX91000679 and BBEX91000680 have been re-submitted, accepted, and CREE is now calculated

Let me know when the other ones are unlocked, and I will re-submit them.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

**From:** [Ex. 7]@vw.com>  
**To:** Robert Peavyhouse/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA  
**Cc:** [Ex. 7]@vw.com>, [Ex. 7]@vw.com>  
**Date:** 11/23/2011 02:03 PM  
**Subject:** RE: VW Group- EPA test re-processing

Hello Bob and Jim,

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3) CBEXV06.0501 has now been unlocked.

Thanks for the help,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office



Rochester Hills, MI  
United States

**Ex. 7**

**Ex. 7** @vw.com

From: Peavyhouse.Robert@epamail.epa.gov [mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Wednesday, November 23, 2011 1:13 PM  
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Cc: Snyder.Jim@epamail.epa.gov; **Ex. 7**; **Ex. 4 - CBI** @csc.com  
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CVWX91000960 has been re-submitted, accepted, and CREE is now calculated

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CADX91000967 has been re-submitted, accepted, and CREE is now calculated

CADX91000988 has been re-submitted, accepted, and CREE is now calculated  
CADX91000951 has been re-submitted, accepted, and CREE is now calculated

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BBEX91000758 has been re-submitted, accepted, and CREE is now calculated

If you can get the the 4 testgroups unlocked within the next hour, I will try to get them re-submitted again this afternoon.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: [Ex. 7]@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, [Ex. 4 - CBI]@csc.com>, [Ex. 7]@vw.com>, [Ex. 7]@vw.com>, [Ex. 7]@vw.com>  
Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

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BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679  
BBEX91000680

BBEX91000783  
BBEX91000758

Regards,

[Ex. 7]

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

**Ex. 7**

Ex. 7 @vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 11/28/2011 6:48:55 PM  
**Subject:** FW: VW Group- EPA test re-processing  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
<http://www.epa.gov/nvfel/>

Jim,

I have uploaded the re-revised Application and submitted a certification request for the test group CVWXV02.5259. You should now be able to process a certificate to include the Beetle Convertible carline.

Of interest is the newly calculated Opt-CREE does not appear in the Section 7 CSI after Bob Peavyhouse included it in the EPA tests mentioned below. Although not a show stopper for now, it would be a good reference to have for the future.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

From: Peavyhouse.Robert@epamail.epa.gov [mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Monday, November 28, 2011 10:21 AM  
To: Rodgers, William  
Subject: RE: VW Group- EPA test re-processing

Bill,

Tests BVWX91000666 and BVWX91000667 now have CREE and Opt-CREE calculated.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfe/>

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 12/1/2011 2:00:09 PM  
**Subject:** RE: CHUB-Q5A Laboratory Test Data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Vince,

Can you please email me scans of the lab results from yesterday's Audi Q5 Hybrid retests.

If they were already faxed, its possible they went to my telephone number because I have been receiving calls from a fax machine this morning.

Thanks,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Thur 12/1/2011 2:07:58 PM  
**Subject:** RE: CHUB-Q5A Laboratory Test Data  
[CHUB-Q5A\\_11-30-2011.pdf](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Good morning Bill,

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/01/2011 09:00 AM  
Subject: RE: CHUB-Q5A Laboratory Test Data

Hello Vince,

Can you please email me scans of the lab results from yesterday's Audi Q5 Hybrid retests.

If they were already faxed, its possible they went to my telephone number because I have been receiving calls from a fax machine this morning.

Thanks,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI


United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0324-012		Vehicle ID: CHUB-Q5A					
	Test Date: 11/30/2011		MFR Name: AUDI				
	Key Start / Hot Soak: 08:27:04 / 09:36		MFR Codes: 640      ADX				
	Fuel Container ID: F00023		Config #: 00				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: S				
	Test Procedure: 21.04 Fed Fuel 2-day Exhaust (CAN LOAD)		Shift Schedule: A09980005				
	Calculation Method: Gasoline		Beginning Odometer: 004930.0 MI				
Pretest Remarks:		Drive Schedule: ftp4bag Soak Period: 18.7 hours					
<b>Bag Data</b>		<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NonMeth HC</b>
<b>Phase 1</b>		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Sample		6.402	29.015	2.000	1.033	2.583	
Ambient		2.408	0.000	0.004	0.043	1.925	
Net Concentration		4.181	29.015	1.996	0.994	0.807	3.225
Remarks:							
<b>Phase 2</b>							
Sample		2.432	8.765	0.452	0.536	1.877	
Ambient		2.401	0.000	0.003	0.042	1.924	
Net Concentration		0.128	8.765	0.449	0.496	0.030	0.092
Remarks:							
<b>Phase 3</b>							
Sample		2.565	11.363	0.525	0.830	1.909	
Ambient		2.359	0.000	0.003	0.042	1.921	
Net Concentration		0.353	11.363	0.522	0.790	0.107	0.226
Remarks:							
<b>Phase 4</b>							
Sample		2.411	15.231	0.563	0.521	1.884	
Ambient		2.371	0.000	0.006	0.042	1.917	
Net Concentration		0.133	15.231	0.558	0.481	0.042	0.083
Remarks:							
<b>Results</b>		<b>HC-FID</b>	<b>CO</b>	<b>NOx</b>	<b>CO2</b>	<b>CH4</b>	<b>NMHC / NMOG</b>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.052	0.729	0.074	392.7	0.012	0.040 / 0.042
Phase 2		0.003	0.351	0.027	312.1	0.001	0.002 / 0.002
Phase 3		0.004	0.287	0.020	314.1	0.002	0.003 / 0.003
Phase 4		0.003	0.609	0.033	302.4	0.001	0.002 / 0.002
Weighted		0.01335	0.48831	0.03655	326.503	0.00327	0.0100 / 0.0104
							(NMOG=1.04xNMHC)
<b>Fuel Economy</b>		<b>Gasoline MPG</b>			<b>Dyno Settings</b>		
Phase 1		22.60			Dyno #: D329 - AWD		
Phase 2		28.48			Inertia: 4750		
Phase 3		28.31			EPA Set Co A: -9.61		
Phase 4		29.35			EPA Set Co B: -0.164		
Weighted		27.16			EPA Set Co C: 0.02573		
		1% SOC Limit	Act SOC A-hr	Sys Nom Volts	Charge State	Emiss-Bench: Mexa 7200ste	
		0.6968	-0.136	264.0	Pass		
<div style="display: flex; justify-content: space-between;"> <span>v101208 - d329    EPAVDAEm111130075524</span> <span>Page 1 of 2</span> <span>Print Time 30-Nov-2011 16:30</span> </div>							

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-012

Vehicle ID: CHUB-Q5A

Results	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.187	2.620	0.267	1410.4	0.042	0.144	1.185
Phase 2	0.010	1.353	0.103	1203.2	0.003	0.007	
Phase 3	0.016	1.031	0.070	1126.9	0.006	0.010	
Phase 4	0.010	2.352	0.128	1167.6	0.004	0.006	

## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.88	28.89	28.90	28.91
Avg Cell Temp (degF)	75.32	75.35	75.20	75.64
Dew Point (degF)	48.49	48.23	48.36	48.40
Specific Humidity (grains/lbm)	52.40	51.88	52.13	52.20
NOx Corr Factor	0.9040	0.9020	0.9029	0.9032
CO2 Dilution Factor	12.924	24.943	16.126	25.61
CFV Vmix (scf @68F)	2738.67	4683.76	2752.66	4683.05
CVS Flow Rate Avg (scfm)	324.04	321.17	325.63	323.08
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	507.10	870.00	507.20	869.70
Distance (miles)	3.592	3.855	3.588	3.861
Bag Analysis Time (secs)	143.8	148.7	143.8	154.8

## MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0163	0.51	0.03	306	0	0.0136

Odometer  
4448 M

MPG  
29

MPG is 6.76 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

Cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0324-013		Vehicle ID: CHUB-Q5A					
Test Date: 11/30/2011		MFR Name: AUDI					
Key Start: 09:54:55		MFR Codes: 640      ADX					
Fuel Container ID: F00023		Config #: 00					
Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: S					
Test Procedure: 03 HWFET (hwfetprep_hwfet)		Shift Schedule: A09980011					
Calculation Method: Gasoline		Beginning Odometer: 004945.0 MI					
Pretest Remarks:		Drive Schedule: hwfet_hwfet					
<b>Bag Data</b>							
	HC-FID	CO	NOx	CO2	CH4	NonMeth HC	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	3.255	26.889	0.323	1.239	2.150		
Ambient	2.354	0.000	0.003	0.043	1.919		
Net Concentration	1.119	26.889	0.320	1.200	0.408	0.635	
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
	HC-FID	CO	NOx	CO2	CH4	NMHC / NMOG	Vol MPG
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.007	0.356	0.006	249.9	0.003	0.004 / 0.004	35.625
(NMOG=1.04xNMHC)							
<b>Fuel Economy</b>							
	Gasoline MPG			Dyno Settings	Dyno #: D329 - AWD		
Phase 1	35.54			Inertia: 4750			
		1% SOC Limit	Act SOC A-hr	Sys Nom Volts	Charge State	EPA Set Co A: -9.61	
		0.3661	0.0346	264.0	Pass	EPA Set Co B: -0.164	
						EPA Set Co C: 0.02573	
						Emiss-Bench: Mexa 7200sle	
v101208 - d329 EPAVDAEm111130093118							
Page 1 of 2							
Print Time 30-Nov-2011 16:30							

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-013

Vehicle ID: CHUB-Q5A

### Results



	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.075	3.648	0.064	2558.9	0.032	0.043	1.185

### Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.92			
Avg Cell Temp (degF)	75.36			
Dew Point (degF)	48.37			
Specific Humidity (grains/lbm)	52.10			
NOx Corr Factor	0.9028			
CO2 Dilution Factor	10.790			
CFV Vmix (scf @68F)	4115.19			

CVS Flow Rate Avg (scfm) 322.72

Fan Placement: One Fan - Up - Front

Phase Time (secs)	765.10
Distance (miles)	10.238
Bag Analysis Time (secs)	144.8

### MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0125	0.25	0.005	223	0	0.0095

Odometer  
4301 M


MPG  
39.8

MPG is 11.98 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8  
Fuel: 61 Tier 2 Cert Gasoline

cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Information			Test Number: 2011-0324-011				
	Test Date: 11/30/2011		Vehicle ID: CHUB-Q5A				
	Key Start: 10:38:12		MFR Name: AUDI				
	Fuel Container ID: F00023		MFR Codes: 640 ADX				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Config #: 00				
	Test Procedure: 89 US06		Transmission: S				
	Calculation Method: Gasoline		Shift Schedule: A09980041				
Pretest Remarks:			Beginning Odometer: 005965.0 MI				
			Drive Schedule: us06warmup_2bagus06				
<b>Bag Data</b>							
<b>Phase 1</b>		<u>HC-FID</u> (ppmC)	<u>CO</u> (ppm)	<u>NOx</u> (ppm)	<u>CO2</u> (%)	<u>CH4</u> (ppm)	<u>NonMeth HC</u> (ppmC)
Sample		3.327	99.050	1.166	0.931	2.095	
Ambient		2.319	0.000	0.014	0.043	1.899	
Net Concentration		1.172	99.050	1.153	0.891	0.329	0.782
Remarks:							
<b>Phase 2</b>							
Sample		2.751	29.157	1.115	1.164	1.923	
Ambient		2.344	0.000	0.010	0.044	1.901	
Net Concentration		0.611	29.157	1.106	1.124	0.188	0.389
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
		<u>HC-FID</u> (gpm)	<u>CO</u> (gpm)	<u>NOx</u> (gpm)	<u>CO2</u> (gpm)	<u>CH4</u> (gpm)	<u>NMHC / NMOG</u> (gpm)
Phase 1		0.023	3.996	0.069	565.0	0.008	0.016 / 0.016
Phase 2		0.005	0.515	0.029	312.3	0.002	0.003 / 0.004
Composite		0.00935	1.28686	0.03789	368.298	0.00316	(NMOG=1.04xNMHC) 0.0061 / 0.0064
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	15.58	Dyno #: D329 - AWD					
Phase 2	28.44	Inertia: 4750					
		EPA Set Co A: -9.61					
		EPA Set Co B: -0.164					
		EPA Set Co C: 0.02573					
		<u>1% SOC Limit</u>	<u>Act SOC A-hr</u>	<u>Sys Nom Volts</u>	<u>Charge State</u>		
		0.4221	-0.0049	264.0	Pass		
Composite	24.06	Emiss-Bench: Mexa 7200sle					
v101208 - d329 EPAVDAEm111130101509 Page 1 of 2 Print Time 30-Nov-2011 16:30							

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-011

Vehicle ID: CHUB-Q5A

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.041	7.080	0.122	1001.0	0.013	0.028	1.185
Phase 2	0.033	3.206	0.181	1942.6	0.012	0.021	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.95	28.95		
Avg Cell Temp (degF)	75.01	74.80		
Dew Point (degF)	48.36	48.53		
Specific Humidity (grains/lbm)	52.04	52.38		
NOx Corr Factor	0.9026	0.9039		
CO2 Dilution Factor	14.232	11.478		
CFV Vmix (scf @68F)	2167.88	3334.67		

CVS Flow Rate Avg (scfm) 548.60 548.17

Fan Placement: USO6 Only - One Large Fan - Up - Front

Phase Time (secs)	130.00	365.00	107.09
Distance (miles)	1.772	6.221	
Bag Analysis Time (secs)	149.8	401.8	

### MFR Test Results

for Procedure 90 US06

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0139	0.63	0.015	322	0	0.0097

Odometer  
4321 M

MPG  
27.5

MPG is 14.28 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8

Fuel: 61 Tier 2 Cert Gasoline

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Arvon Mitcham/AA/USEPA/US@EPA; [Ex. 7]@vw.com];  
[Ex. 7]@vw.com]; [Ex. 7]@vw.com];  
[Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Thur 12/1/2011 2:43:42 PM  
**Subject:** Durability Procedure Carryover

Hello Jim:

Just a note to inform you that Volkswagen submitted to VERIFY a request for carryover of previously-approved durability procedures for the 2013 model year.

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: [Ex. 7]@vw.com

To: Jim Snyder/AA/USEPA/US@EPA[]  
Cc: [Ex. 7]@vw.com]; [Ex. 7]  
[Ex. 7]@vw.com]; ([Ex. 7]@vw.com]  
From: [Ex. 7]  
Sent: Thur 12/17/2011 3:02:34 PM  
Subject: VW Group: 2011 Common Section RFA  
[Ex. 7]@vw.com

Hello Jim,

We have uploaded to Verify a request for a deadline extension related to the submittal of 2011 model year Common Sections. Please let me know if you have any questions.

Thanks,

[Ex. 7]

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

[Ex. 7]

[Ex. 7]@vw.com



**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Fri 12/2/2011 3:28:17 PM  
**Subject:** RE: CHUB-Q5A Laboratory Test Data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Vince,

Audi has requested retests for the FTP and HWY cycles as allowed by regulation. Please make the necessary arrangements to put this vehicle CHUB-Q5A back on the testing schedule.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Thursday, December 01, 2011 9:08 AM  
To: Rodgers, William  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: RE: CHUB-Q5A Laboratory Test Data

Good morning Bill,

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/01/2011 09:00 AM  
Subject: RE: CHUB-Q5A Laboratory Test Data

Hello Vince,

Can you please email me scans of the lab results from yesterday's Audi Q5 Hybrid retests.

If they were already faxed, its possible they went to my telephone number because I have been receiving calls from a fax machine this morning.

Thanks,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 12/2/2011 3:32:09 PM  
**Subject:** RE: CHUB-Q5A Laboratory Test Data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Bill,

Thanks for the note. I'll request the retests.

Have a great weekend!

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/02/2011 10:28 AM  
Subject: RE: CHUB-Q5A Laboratory Test Data

Hello Vince,

Audi has requested retests for the FTP and HWY cycles as allowed by regulation. Please make the necessary arrangements to put this vehicle CHUB-Q5A back on the testing schedule.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Thursday, December 01, 2011 9:08 AM  
To: Rodgers, William  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: RE: CHUB-Q5A Laboratory Test Data

Good morning Bill,

Please find enclosed the Laboratory Test Data for the Subject vehicle. If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/01/2011 09:00 AM  
Subject: RE: CHUB-Q5A Laboratory Test Data

Hello Vince,

Can you please email me scans of the lab results from yesterday's Audi Q5 Hybrid retests.

If they were already faxed, its possible they went to my telephone number because I have been receiving calls from a fax machine this morning.

Thanks,

Bill Rodgers

Emissions Certification Specialist

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Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

To: Jim Snyder/AA/USEPA/US@EPA[]  
Cc: [Ex. 7]@vw.com; [Ex. 7]  
[Ex. 7]@vw.com  
From: [Ex. 7]  
Sent: Tue 12/6/2011 1:03:01 PM  
Subject: VW GHG Pre Model Report  
@vw.com  
<http://www.volkswagengroupamerica.com/>

Jim

This note is intended to make you aware of that the 2013 GHG Pre Model year report has been submitted via the Verify system. The filename is:

CBI\_DVWXV\_COMMON\_CR1\_CAR.PDF

[Ex. 7] will follow-up to discuss. Thanks!!!

Regards,

[Ex. 7]

Certification Specialist

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office (EEO)  
2930 Technology Drive

Rochester Hills Michigan 48309

United States of America

[Ex. 7]

E: [Ex. 7]@vw.com

<http://www.volkswagengroupamerica.com/>

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To: [Ex. 7]@vw.com]; im Snyder/AA/USEPA/US@EPA; [Ex. 7]  
[Ex. 7]@vw.com]; [Ex. 7]@vw.com]  
From: [Ex. 7]  
Sent: Tue 12/6/2011 2:21:39 PM  
Subject: RE: VW GHG Pre Model Report  
@vw.com  
<http://www.volkswagengroupamerica.com/>

[Ex. 7]

I called Jim Snyder and left a message reminding him that we sent the GHG report and a request for alternate durability procedure carryover. I also said that we would like to meet. Finally, I asked if it is okay to begin submitting 2013 documents. On the last point, I ask Jim to call [Ex. 7]

Regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: [Ex. 7]@vw.com

From: [Ex. 7]  
Sent: Tuesday, December 06, 2011 8:03 AM  
To: [snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
Cc: [Ex. 7]  
Subject: VW GHG Pre Model Report

Jim

This note is intended to make you aware of that the 2013 GHG Pre Model year report has been submitted via the Verify system. The filename is:

CBI\_DVWXV\_COMMON\_CR1\_CAR.PDF

**Ex. 7** will follow-up to discuss. Thanks!!!

Regards,

**Ex. 7**

Certification Specialist

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office (EEO)  
2930 Technology Drive

Rochester Hills Michigan 48309

United States of America

**Ex. 7**

E: **Ex. 7**@vw.com

<http://www.volkswagengroupamerica.com/>

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA;"Marques, Marcos"  
[Marcos.Marques@audi.com]; Marques, Marcos" [Marcos.Marques@audi.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 12/6/2011 4:05:12 PM  
**Subject:** VW Group - Audi Q5 Hybrid FTP HWY retest  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Our resident Audi engineer, Marcos Margues, will arrive at 7am Thursday to witness the start of the test.  
Please let us know if the start time changes from the expected early morning hours.

Confirmatory Test Date has been set for the following vehicle :

Manufacturer: ADX

Vehicle ID: CHUB-Q5A

Vehicle Configuration: 0

The test date is 12/08/2011.

The Verify submission this message relates to has the following values:

Vehicle ID: CHUB-Q5A

Vehicle Configuration #: 0

Test Group Name: CADXT02.0HUB

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Marques, Marcos" [Marcos.Marques@audi.com]; Marques, Marcos" [Marcos.Marques@audi.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Wed 12/7/2011 6:44:27 PM  
**Subject:** Re: VW Group - Audi Q5 Hybrid FTP HWY retest  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Bill,

I spoke with the lab and we will not test this vehicle until later in the morning. Please have Marcos here around 10:00 a.m. If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Vincent Mazaitis/AA/USEPA/US@EPA, "Marques, Marcos" <Marcos.Marques@audi.com>  
Date: 12/06/2011 11:05 AM  
Subject: VW Group - Audi Q5 Hybrid FTP HWY retest

Hello Jim,

Our resident Audi engineer, Marcos Margues, will arrive at 7am Thursday to witness the start of the test. Please let us know if the start time changes from the expected early morning hours.

Confirmatory Test Date has been set for the following vehicle :

Manufacturer: ADX

Vehicle ID: CHUB-Q5A

Vehicle Configuration: 0

The test date is 12/08/2011.

The Verify submission this message relates to has the following values:

Vehicle ID: CHUB-Q5A

Vehicle Configuration #: 0

Test Group Name: CADXT02.0HUB

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

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office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

To: Jim Snyder/AA/USEPA/US@EPA[]  
Cc: Karen Danzeisen/AA/USEPA/US@EPA; [Ex. 7]  
[Ex. 7] @vw.com; [Ex. 7] @vw.com; [Ex. 7]  
[Ex. 7] @vw.com  
From: [Ex. 7]  
Sent: Thur 12/8/2011 12:42:46 PM  
Subject: RE: VW Group- EPA test re-processing  
[Ex. 7] @vw.com  
[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)  
[Ex. 7] @vw.com  
[image001.gif](#)

Hello Jim,

This should not be a problem. I forwarded the message to the responsible Porsche certification engineer, Ross Gatzke, to get their file reprocessing done.

Regards,

**Ex. 7**

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

**Ex. 7**

[Ex. 7] @vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, December 07, 2011 5:56 PM

To: **Ex. 7**  
Subject: Fw: VW Group- EPA test re-processing

**Ex. 7** We have an issue with the test groups that Bob Peavyhouse re-submitted test data for. You need to re-process these test groups so that the data appears in the CSI. Read Karen's note for a better explanation.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 12/07/2011 05:46 PM -----

From: Karen Danzeisen/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 12/06/2011 06:57 PM  
Subject: Re: Fw: VW Group- EPA test re-processing

Hi Jim,

As we discussed earlier today, I recently discovered that when Bob reprocessed the EPA tests in order to get CREE calculations working we lost the cert levels and standards for each testgroup for which the test has been used. What we didn't realize was that when EPA staff performs a correction to an EPA test the Testgroup does \*not\* automatically get reprocessed as it does when a manufacturer submits a correction to their own tests. Therefore, we need to request VW to reprocess all the applicable testgroups shown in the chart next to the tests which we modified:

In total there are 11 unique testgroups that need reprocessing. If you were to look at a CSI Report for any of these testgroups right now you would see that the standards/cert levels section are blank for the tests corresponding tests. I'm pretty sure this is an exhaustive list for VW, but if there are any other times that you recall where LOD may have submitted a correction to a test after the most recent version of the testgroup, then there might be a similar problem with it.

Please note that the manufacturer will need to unlock the test in the Cert Request module before attempting to reprocess the Testgroups. Hopefully they have saved the most recent XML for each testgroup so that all they would need to do is change the process code from New to Correction (if necessary). Once they've reviewed the CSI reports after the testgroups have been reprocessed and confirmed that the tests once again have standards and cert levels they should go back to the Cert Request module and lock all the testgroups.

Let me know if you have any questions or would like me to work with the VW staff. Also, a couple of these tests are used for Porsche tests so I don't know if they are also processed by VW staff or if we need to contact Porsche as well.

Karen



---

Karen E. Danzeisen  
Information Technology Specialist  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency  
(734)214-4444      danzeisen.karen@epa.gov

Check out EPA's Green Vehicle Guide at "[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)"

From: Robert Peavyhouse/AA/USEPA/US  
To: Karen Danzeisen/AA/USEPA/US@EPA  
Date: 12/06/2011 01:09 PM  
Subject: Fw: VW Group- EPA test re-processing

----- Forwarded by Robert Peavyhouse/AA/USEPA/US on 12/06/2011 01:08 PM -----

From: [REDACTED] **Ex. 7** @vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, <[REDACTED] **Ex. 4 - CBI** @csc.com>, [REDACTED] **Ex. 7** @vw.com>, [REDACTED] **Ex. 7** @vw.com> [REDACTED] **Ex. 7** @vw.com>  
Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello Bob,

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

BVWX91000666  
BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966

CADX91000967

CADX91000988

CADX91000951

BBEX91000679

BBEX91000680

BBEX91000783

BBEX91000758

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

**Ex. 7**

**Ex. 7**

@vw.com

MFR_NM	MFR_CD	Modified	Verify TEST_NUMBER	Applicable Testgroup	Needing Reprocessing
Audi	ADX	CADX91000951		CAD XV02.53UK	
Audi	ADX	CADX91000966		CAD XT03.03UG	
Audi	ADX	CADX91000967		CAD XT03.03UG	
Audi	ADX	CADX91000988		CAD XV02.53UK	
Bentley Motors Ltd.	BEX	BBEX91000679		BBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000679		CBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000680		BBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000680		CBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000758		CBEXV06.84LA	
Bentley Motors Ltd.	BEX	BBEX91000783		CBEXV06.84LA	
Volkswagen	VWX	BVWX91000820		BP RXT03.0CHD	
Volkswagen	VWX	BVWX91000820		BVWX T03.0HEV	
Volkswagen	VWX	BVWX91000820		CP RXT03.0CHD	
Volkswagen	VWX	BVWX91000820		CVWX T03.0HEV	
Volkswagen	VWX	BVWX91000820		DP RXT03.0CHD	
Volkswagen	VWX	BVWX91000842		BP RXT03.0CHD	
Volkswagen	VWX	BVWX91000842		BVWX T03.0HEV	
Volkswagen	VWX	BVWX91000842		CP RXT03.0CHD	
Volkswagen	VWX	BVWX91000842		CVWX T03.0HEV	
Volkswagen	VWX	BVWX91000842		DP RXT03.0CHD	
Volkswagen	VWX	CVWX91000960		CVWXV02.0U4S	
Volkswagen	VWX	CVWX91000985		CVWXV02.0U4S	

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 12/8/2011 1:36:43 PM  
**Subject:** Bugatti  
[Bugatti-veyron.pps](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I ran across this PowerPoint from when the Bugatti Veyron was introduced a few years ago. Thought you might like it.

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Karen Danzeisen/AA/USEPA/US@EPA[]; **Ex. 7**  
**Ex. 7** @vw.com]; **Ex. 7** @vw.com]  
**From:** **Ex. 7**  
**Sent:** Thur 12/8/2011 2:41:55 PM  
**Subject:** RE: VW Group- EPA test re-processing  
**Ex. 7** @vw.com  
[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)  
[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)  
**Ex. 7** @vw.com  
[image001.gif](#)  
[image002.gif](#)

Jim,

This was already done, so perhaps there is another issue here.

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**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

**Ex. 7**

**Ex. 7** @vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, December 08, 2011 9:26 AM  
To: [REDACTED] Ex. 7  
Subject: Fw: VW Group- EPA test re-processing

[REDACTED] Ex. 7 Karen found another Test group to re-process.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 12/08/2011 09:24 AM -----

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To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/07/2011 07:12 PM  
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(734)214-4444 danzeisen.karen@epa.gov

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Cc: Robert Peavyhouse/AA/USEPA/US@EPA  
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To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, <**Ex. 4 - CBI** [REDACTED]@csc.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>  
Date: 11/23/2011 08:33 AM  
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Regards,

[REDACTED] **Ex. 7** [REDACTED]



Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
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United States

**Ex. 7**

**Ex. 7** }@vw.com

MFR_CD	VERIFY_TEST_NUM	TEST SUBMIT DT	TG SUBMIT DT	TESTGROUP_TO_REPROCESS
ADX	CADX91000951	11/28/2011 8:52:31	7/8/2011	CADXV02.53UK
ADX	CADX91000966	11/28/2011 8:54:19	7/7/2011	CADXT03.03UG
ADX	CADX91000967	11/28/2011 8:51:05	7/7/2011	CADXT03.03UG
ADX	CADX91000988	11/28/2011 8:49:54	7/8/2011	CADXV02.53UK
BEX	BBEX91000679	11/23/2011 14:33:13	9/7/2011	CBEXV06.0501
BEX	BBEX91000679	11/23/2011 14:33:13	11/30/2010	BBEXV06.0501
BEX	BBEX91000680	11/23/2011 14:34:26	11/30/2010	BBEXV06.0501
BEX	BBEX91000680	11/23/2011 14:34:26	9/7/2011	CBEXV06.0501
BEX	BBEX91000758	11/23/2011 14:40:19	8/30/2011	CBEXV06.84LA
BEX	BBEX91000783	11/23/2011 14:41:29	8/30/2011	CBEXV06.84LA
VVWX	BVWX91000666	11/28/2011 10:17:41	11/28/2011	CVWXV02.5259
VVWX	BVWX91000667	11/28/2011 10:18:52	11/28/2011	CVWXV02.5259
VVWX	BVWX91000820	11/28/2011 8:40:21	5/26/2011	CPRXT03.0CHD
VVWX	BVWX91000820	11/28/2011 8:40:21	10/31/2011	BVWXT03.0HEV
VVWX	BVWX91000820	11/28/2011 8:40:21	7/7/2011	CVWXT03.0HEV
VVWX	BVWX91000820	11/28/2011 8:40:21	1/6/2011	BPRXT03.0CHD
VVWX	BVWX91000820	11/28/2011 8:40:21	9/27/2011	DPRXT03.0CHD
VVWX	BVWX91000842	11/28/2011 8:39:10	9/27/2011	DPRXT03.0CHD
VVWX	BVWX91000842	11/28/2011 8:39:10	5/26/2011	CPRXT03.0CHD
VVWX	BVWX91000842	11/28/2011 8:39:10	10/31/2011	BVWXT03.0HEV
VVWX	BVWX91000842	11/28/2011 8:39:10	7/7/2011	CVWXT03.0HEV
VVWX	BVWX91000842	11/28/2011 8:39:10	1/6/2011	BPRXT03.0CHD
VVWX	CVWX91000960	11/28/2011 8:45:31	7/7/2011	CVWXV02.0U4S
VVWX	CVWX91000985	11/28/2011 8:44:19	7/7/2011	CVWXV02.0U4S

To: Jim Snyder/AA/USEPA/US@EPA[]  
Cc: Karen Danzeisen/AA/USEPA/US@EPA[]; Ex. 7  
Ex. 7 @vw.com]; Ex. 7 @vw.com]  
From: Ex. 7  
Sent: Thur 12/8/2011 3:53:28 PM  
Subject: RE: VW Group- EPA test re-processing  
Ex. 7 @vw.com  
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[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)  
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[image001.gif](#)  
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Engineering and Environmental Office

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**Ex. 7**

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From: **Ex. 7**  
Sent: Thursday, December 08, 2011 9:42 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Cc: 'danzeisen.karen@epa.gov'; **Ex. 7**  
Subject: RE: VW Group- EPA test re-processing

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Cc: CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA; [Ex. 7]  
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From: CN=Karen Danzeisen/OU=AA/O=USEPA/C=US  
Sent: Thur 12/8/2011 4:13:24 PM  
Subject: RE: VW Group- EPA test re-processing  
[Ex. 7]@vw.com  
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[Ex. 7]@vw.com  
(embedded image)  
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Great. It looks like the Porsche testgroups do now have cert levels and standards for those tests once again.

Thank you for passing the request along to Ross.

Karen

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[Ex. 7]@vw.com]; [Ex. 7]@vw.com]  
**From:** CN=Karen Danzeisen/OU=AA/O=USEPA/C=US  
**Sent:** Thur 12/8/2011 5:25:38 PM  
**Subject:** RE: VW Group- EPA test re-processing  
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[Ex. 7]@vw.com  
(embedded image)  
(embedded image)

**Ex. 7**

You're right. This one appears to be ok. I was selecting these testgroups based on the submission date of the test information being greater than the last submission date of the testgroup. As it turns out, I should have used 'greater or equal to' because the dates are not stored to the hour and minute -- only the month, day and year. Even so, when I looked at the most recent CSI Report on our Verify portal the cert levels and standards weren't there, but that may just indicate a problem with our portal because the cert levels do appear when I look directly into our database.

Sorry for the confusion on this one.

Karen

---

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Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 12/08/2011 09:24 AM -----

From: Karen Danzeisen/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/07/2011 07:12 PM  
Subject: Fw: VW Group- EPA test re-processing

Hi Jim,

Just after you left I checked over a new and improved query result that I came up with this afternoon and found that I left off testgroup CVWXV02.5259 from the original list (see attached) for tests BVWX91000666 and BVWX91000667. Here is the new list including that change. Everything else remains the same.

Ideally VW could reprocess by Monday so that I could begin processing a complete update for the Green Vehicle Guide. It would be helpful to know if that's possible. If they have all the XML files for these testgroups and the available time, then it should be possible.

Thanks,

Karen

---

Karen E. Danzeisen  
Information Technology Specialist  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency  
(734)214-4444      danzeisen.karen@epa.gov

Check out EPA's Green Vehicle Guide at "[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)"

----- Forwarded by Karen Danzeisen/AA/USEPA/US on 12/07/2011 07:01 PM -----

From: Karen Danzeisen/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 12/06/2011 06:57 PM  
Subject: Re: Fw: VW Group- EPA test re-processing

Hi Jim,

As we discussed earlier today, I recently discovered that when Bob reprocessed the EPA tests in order to get CREE calculations working we lost the cert levels and standards for each testgroup for which the test has been used. What we didn't realize was that when EPA staff performs a correction to an EPA test the Testgroup does *\*not\** automatically get reprocessed as it does when a manufacturer submits a correction to their own tests. Therefore, we need to request VW to reprocess all the applicable testgroups shown in the chart next to the tests which we modified:

In total there are 11 unique testgroups that need reprocessing. If you were to look at a CSI Report for any of these testgroups right now you would see that the standards/cert levels section are blank for the tests corresponding tests. I'm pretty sure this is an exhaustive list for VW, but if there are any other times that you recall where LOD may have submitted a correction to a test after the most recent version of the testgroup, then there might be a similar problem with it.

Please note that the manufacturer will need to unlock the test in the Cert Request module before attempting to reprocess the Testgroups. Hopefully they have saved the most recent XML for each testgroup so that all they would need to do is change the process code from New to Correction (if necessary). Once they've reviewed the CSI reports after the testgroups have been reprocessed and confirmed that the tests once again have standards and cert levels they should go back to the Cert Request module and lock all the testgroups.

Let me know if you have any questions or would like me to work with the VW staff. Also, a couple of these tests are used for Porsche tests so I don't know if they are also processed by VW staff or if we need to contact Porsche as well.

Karen

---

Karen E. Danzeisen  
Information Technology Specialist  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency



(734)214-4444 danzeisen.karen@epa.gov

Check out EPA's Green Vehicle Guide at "[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)"

From: Robert Peavyhouse/AA/USEPA/US  
To: Karen Danzeisen/AA/USEPA/US@EPA  
Date: 12/06/2011 01:09 PM  
Subject: Fw: VW Group- EPA test re-processing

----- Forwarded by Robert Peavyhouse/AA/USEPA/US on 12/06/2011 01:08 PM -----

From: [REDACTED] Ex. 7 @vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, [REDACTED] Ex. 4 - CBI@csc.com>, [REDACTED] Ex. 7 @vw.com>, [REDACTED] Ex. 7 @vw.com>, [REDACTED] Ex. 7 @vw.com>  
Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello Bob,

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

BVWX91000666  
BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679  
BBEX91000680

BBEX91000783  
BBEX91000758

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

**Ex. 7**

**Ex. 7**@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA;Robert Peavyhouse/AA/USEPA/US@EPA[]; obert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Karen Danzeisen/AA/USEPA/US@EPA; [Ex. 7]  
[Ex. 7]@vw.com; [Ex. 7]@vw.com]  
**From:** [Ex. 7]  
**Sent:** Fri 12/9/2011 2:39:24 PM  
**Subject:** VW Group- EPA test re-processing  
[Ex. 7]@vw.com  
[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)  
[Ex. 7]@vw.com  
[image001.gif](#)

Hello Bob and Jim,

I am having trouble re-processing the test group xml for Bentley CBEXV06.0501. I believe you that EPA will need to re-process tests BBEX91000698 and BBEX91000699 so that CREE can be calculated.

I requested a verify report for the two above tests and there were no CREE tags.

The message I receive after my attempt is as follows:

Transaction Status Identifier : REJECTED

Transaction Message Text : LD-CERT-TG-BR189 - If the Model Year (TG-6) is greater than or equal to 2012 and if the Exhaust Test Number (TG-202.5) has a Test 5-Cycle Category (TI-45) of 'FTP75' or 'HWY', then that Exhaust Test Number (TG-202.5) must have a Rounded Adjusted CREE (TI-19.4) or Rounded Adjusted OPT-CREE (TI-19.8). The test number specified will need to be resubmitted to allow Verify to perform this calculation. (Test Number: BBEX91000699)

Transaction Message Text : LD-CERT-TG-BR189 - If the Model Year (TG-6) is greater than or equal to 2012 and if the Exhaust Test Number (TG-202.5) has a Test 5-Cycle Category (TI-45) of 'FTP75' or 'HWY', then that Exhaust Test Number (TG-202.5) must have a Rounded Adjusted CREE (TI-19.4) or Rounded Adjusted OPT-CREE (TI-19.8). The test number specified will need to be resubmitted to allow Verify to perform this calculation. (Test Number: BBEX91000698)

Please let me know if you can help on this.

Regards,

[Ex. 7]

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

**Ex. 7**

From: **Ex. 7**

Sent: Thursday, December 08, 2011 7:43 AM

To: Snyder.Jim@epamail.epa.gov

Cc: danzeisen.karen@epa.gov; **Ex. 7**

Subject: RE: VW Group- EPA test re-processing

Hello Jim,

This should not be a problem. I forwarded the message to the responsible Porsche certification engineer, **Ex. 7**

**Ex. 7** to get their file reprocessing done.

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

Rochester Hills, MI

United States

**Ex. 7**

**Ex. 7** @vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Wednesday, December 07, 2011 5:56 PM

To: **Ex. 7**

Subject: Fw: VW Group- EPA test re-processing

**Ex. 7** we have an issue with the test groups that Bob Peavyhouse re-submitted test data for. You need to re-process these test groups so that the data appears in the CSI. Read Karen's note for a better explanation.

Jim Snyder

Light-Duty Vehicle Group

Compliance and Innovative Strategies Division

United States Environmental Protection Agency

(734) 214-4946

snyder.jim@epa.gov

----- Forwarded by Jim Snyder/AA/USEPA/US on 12/07/2011 05:46 PM -----

From: Karen Danzeisen/AA/USEPA/US

To: Jim Snyder/AA/USEPA/US@EPA

Cc: Robert Peavyhouse/AA/USEPA/US@EPA

Date: 12/06/2011 06:57 PM

Subject: Re: Fw: VW Group- EPA test re-processing

Hi Jim,

As we discussed earlier today, I recently discovered that when Bob reprocessed the EPA tests in order to get CREE calculations working we lost the cert levels and standards for each testgroup for which the test has been used. What we didn't realize was that when EPA staff performs a correction to an EPA test the Testgroup does \*not\* automatically get reprocessed as it does when a manufacturer submits a correction to their own tests. Therefore, we need to request VW to reprocess all the applicable testgroups shown in the chart next to the tests which we modified:

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Please note that the manufacturer will need to unlock the test in the Cert Request module before attempting to reprocess the Testgroups. Hopefully they have saved the most recent XML for each testgroup so that all they would need to do is change the process code from New to Correction (if necessary). Once they've reviewed the CSI reports after the testgroups have been reprocessed and confirmed that the tests once again have standards and cert levels they should go back to the Cert Request module and lock all the testgroups.

Let me know if you have any questions or would like me to work with the VW staff. Also, a couple of these tests are used for Porsche tests so I don't know if they are also processed by VW staff or if we need to contact Porsche as well.

Karen

---

Karen E. Danzeisen  
Information Technology Specialist  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency  
(734)214-4444      danzeisen.karen@epa.gov

Check out EPA's Green Vehicle Guide at "[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)"

From: Robert Peavyhouse/AA/USEPA/US  
To: Karen Danzeisen/AA/USEPA/US@EPA  
Date: 12/06/2011 01:09 PM  
Subject: Fw: VW Group- EPA test re-processing

----- Forwarded by Robert Peavyhouse/AA/USEPA/US on 12/06/2011 01:08 PM -----

From: [Ex. 7]@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, [Ex. 4 - CBI]@csc.com>, [Ex. 7]@vw.com>,  
[Ex. 7]@vw.com>, [Ex. 7]@vw.com>

Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello Bob,

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

BVWX91000666  
BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679  
BBEX91000680

BBEX91000783  
BBEX91000758

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

**Ex. 7**

**Ex. 7** @vw.com

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 12/9/2011 6:04:18 PM  
**Subject:** Re: CHUB-Q5A Laboratory Data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Bill,

I checked again after lunch and nothing yet. My guess is Monday. Hybrids still take longer. I'll keep on looking though and forward the data as soon as I get it.

Best regards,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 12/09/2011 10:04 AM  
Subject: CHUB-Q5A Laboratory Data

Hello Vince,

Have you received any lab test data from yesterday's Audi Q5 Hybrid test? If you could scan and email it to my when you receive it I would appreciate it.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219



fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 12/12/2011 6:24:13 PM  
**Subject:** RE: CHUB-Q5A Laboratory Data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Vince,

I saw the test results on Verify. Would you mind sending the lab results pages? They are much easier to digest.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Friday, December 09, 2011 1:04 PM  
To: Rodgers, William  
Cc: Snyder.Jim@epamail.epa.gov  
Subject: Re: CHUB-Q5A Laboratory Data

Hello Bill,

I checked again after lunch and nothing yet. My guess is Monday. Hybrids still take longer. I'll keep on looking though and forward the data as soon as I get it.

Best regards,

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From: "Rodgers, William" <William.Rodgers@vw.com>  
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Emissions Certification Engineer

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 12/12/2011 7:46:31 PM  
**Subject:** RE: CHUB-Q5A Laboratory Data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
<mailto:Mazaitis.Vincent@epamail.epa.gov>  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks Jim. Let me know when the shed test gets scheduled.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, December 12, 2011 2:28 PM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: RE: CHUB-Q5A Laboratory Data

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/12/2011 01:24 PM  
Subject: RE: CHUB-Q5A Laboratory Data

Hello Vince,  
I saw the test results on Verify. Would you mind sending the lab results pages? They are much easier to digest.

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Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
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Auburn Hills, MI 48436  
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office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

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Sent: Friday, December 09, 2011 1:04 PM  
To: Rodgers, William  
Cc: Snyder.Jim@epamail.epa.gov  
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Thanks,

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Emissions Certification Engineer

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United States

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fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 7  
**Sent:** Tue 12/13/2011 12:02:52 PM  
**Subject:** Accepted: VW Pre-Cert mtg



**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA, [Ex. 7 @vw.com], [Ex. 7 @vw.com]; [Ex. 4 - CBI @csc.com], [Ex. 4 - CBI @csc.com]; [Ex. 7 @vw.com]  
**From:** [Ex. 7]  
**Sent:** Wed 12/14/2011 6:52:10 PM  
**Subject:** RE: VW Group- EPA test re-processing  
[peavyhouse.robert@epa.gov](mailto:peavyhouse.robert@epa.gov)  
<http://www.epa.gov/nvfel/>  
[Ex. 7 @vw.com]  
[Ex. 4 - CBI @csc.com]  
[Ex. 7 @vw.com]  
[Ex. 7 @vw.com]  
[Ex. 7 @vw.com]  
[Ex. 7 @vw.com]

Hello Bob,

Here are the test numbers for two more EPA confirmatory tests that need to be updated with CREE/Opt-CREE to allow processing of the related CSI.

I have unlocked the related model year 2011 and 2012 active applications.

9VWX09009736

9VWX09009737

Note: These tests date back to the CFEIS System.

[Ex. 7]

**From:** Peavyhouse.Robert@epamail.epa.gov [mailto:Peavyhouse.Robert@epamail.epa.gov]  
**Sent:** Wednesday, November 23, 2011 1:13 PM  
**To:** [Ex. 7]  
**Cc:** Snyder.Jim@epamail.epa.gov, [Ex. 7]  
[Ex. 4 - CBI]  
**Subject:** Re: VW Group- EPA test re-processing

[Ex. 7]

I have pulled copies of each of the tests specified and tried to re-submit them.

I can't re-submit BVWX91000666 because test group CVWXV02.5259 is locked

I can't re-submit BVWX91000667 because test group CVWXV02.5259 is locked

I can't re-submit BVWX91000842 because test groups BPRXT03.0CHD and CPRXT03.0CHD are locked

I can't re-submit BVWX91000820 because test groups BPRXT03.0CHD and CPRXT03.0CHD are locked

CVWX91000985 has been re-submitted, accepted, and CREE is now calculated

CVWX91000960 has been re-submitted, accepted, and CREE is now calculated

CADX91000966 has been re-submitted, accepted, and CREE is now calculated

CADX91000967 has been re-submitted, accepted, and CREE is now calculated

CADX91000988 has been re-submitted, accepted, and CREE is now calculated

CADX91000951 has been re-submitted, accepted, and CREE is now calculated

I can't re-submit BBEX91000679 because test group CBEXV06.0501 is locked

I can't re-submit BBEX91000680 because test group CBEXV06.0501 is locked

BBEX91000783 has been re-submitted, accepted, and CREE is now calculated

BBEX91000758 has been re-submitted, accepted, and CREE is now calculated

If you can get the the 4 testgroups unlocked within the next hour, I will try to get them re-submitted again this afternoon.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: [REDACTED] **Ex. 7** [REDACTED]@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, [REDACTED] **Ex. 4 - CBI** [REDACTED]@csc.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>  
Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello Bob,

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CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679  
BBEX91000680

BBEX91000783  
BBEX91000758

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

**Ex. 7**

**Ex. 7** @vw.com

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA; [Ex. 7]@vw.com; [Ex. 7]  
[Ex. 7]@vw.com; [Ex. 7]@vw.com;  
[Ex. 4 - CBI]@csc.com; [Ex. 4 - CBI]@csc.com; [Ex. 7]  
[Ex. 7]@vw.com  
**From:** [Ex. 7]  
**Sent:** Wed 12/14/2011 7:49:53 PM  
**Subject:** RE: VW Group- EPA test re-processing -ADDITIONAL Tests  
[Peavyhouse.Robert@epamail.epa.gov](mailto:Peavyhouse.Robert@epamail.epa.gov)  
[\[mailto:Peavyhouse.Robert@epamail.epa.gov\]](mailto:mailto:Peavyhouse.Robert@epamail.epa.gov)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[Ex. 4 - CBI]@csc.com  
[peavyhouse.robert@epa.gov](mailto:peavyhouse.robert@epa.gov)  
<http://www.epa.gov/nvfel/>  
[Ex. 7]@vw.com  
[Ex. 4 - CBI]@csc.com  
[Ex. 7]@vw.com  
[Ex. 7]@vw.com  
[Ex. 7]@vw.com  
[Ex. 7]@vw.com

Hello Bob,

Here are the test numbers for two EPA confirmatory tests IN ADDITION TO THOSE BELOW that need to be updated with CREE/Opt-CREE to allow processing of the related CSI.

BVWX91000683

BVWX91000684

Best regards,

**Ex. 7**

**From:** [Ex. 7]  
**Sent:** Wednesday, December 14, 2011 1:52 PM  
**To:** 'Peavyhouse.Robert@epamail.epa.gov'  
**Cc:** Snyder.Jim@epamail.epa.gov; [Ex. 7] [Ex. 4 - CBI]@csc.com; [Ex. 7]  
**Subject:** RE: VW Group- EPA test re-processing

Hello Bob,

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9VWX09009737

Note: These tests date back to the CFEIS System.

**Ex. 7**

From: Peavyhouse.Robert@epamail.epa.gov [mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Wednesday, November 23, 2011 1:13 PM  
To: Rodgers, William  
Cc: Snyder.Jim@epamail.epa.gov, **Ex. 7** **Ex. 4 - CBI**@csc.com  
Subject: Re: VW Group- EPA test re-processing

William,

I have pulled copies of each of the tests specified and tried to re-submit them.

I can't re-submit BVWX91000666 because test group CVWXV02.5259 is locked  
I cant re-submit BVWX91000667 because test group CVWXV02.5259 is locked

I can't re-submit BVWX91000842 because test groups BPRXT03.0CHD and CPRXT03.0CHD are locked  
I can't re-submit BVWX91000820 because test groups BPRXT03.0CHD and CPRXT03.0CHD are locked

CVWX91000985 has been re-submitted, accepted, and CREE is now calculated  
CVWX91000960 has been re-submitted, accepted, and CREE is now calculated

CADX91000966 has been re-submitted, accepted, and CREE is now calculated  
CADX91000967 has been re-submitted, accepted, and CREE is now calculated

CADX91000988 has been re-submitted, accepted, and CREE is now calculated  
CADX91000951 has been re-submitted, accepted, and CREE is now calculated

I can't re-submit BBEX91000679 because test group CBEXV06.0501 is locked  
I can't re-submit BBEX91000680 because test group CBEXV06.0501 is locked

BBEX91000783 has been re-submitted, accepted, and CREE is now calculated  
BBEX91000758 has been re-submitted, accepted, and CREE is now calculated

If you can get the the 4 testgroups unlocked within the next hour, I will try to get them re-submitted again this afternoon.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: [REDACTED] **Ex. 7** [REDACTED]@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, [REDACTED] **Ex. 4 - CBI** [REDACTED]@csc.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>, [REDACTED] **Ex. 7** [REDACTED]@vw.com>  
Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello Bob,

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

BVWX91000666  
BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679

BBEX91000680

BBEX91000783

BBEX91000758

Regards,

**Ex. 7**

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

**Ex. 7**

**Ex. 7**

@vw.com

**To:** Jim.Snyder/AA/USEPA/US/EPA  
**Cc:** Ex. 7 @vw.com; Ex. 7 @vw.com  
**From:** Ex. 7  
**Sent:** Wed 12/14/2011 8:52:58 PM  
**Subject:** VW Group Certificate Request for correction

Hello Jim,

We have submitted an update for Volkswagen test group CVWXV03.6U46 with a correction to the Evaporative Family name.

The evaporative family name was corrected from CVWXR0125246 to CVWXR0125D46. The correction now appears in the application and CSI.

Note, this is a carryover evaporative family with no new technology (previous BVWXR0125246. The only change is in the name suffix so that we can apply only to DFI engines.

We are in the process of requesting a new certificate for this test group / evaporative family (some issues with cert request but help has been requested).

NOTE: Since there is no option to correct an existing certificate request, I intend on requesting a "New" request with the correct combination of testgroup/evap family. Please let me know if this is sufficient.

Please contact me if you have any questions.

Regards,

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.



3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

**Ex. 7**

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 12/19/2011 3:06:51 PM  
**Subject:** VW Group - 2013MY Certificates MIA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Thanks for processing our 2013MY certificates last Thursday. The following two certificates are still Missing in Action. Can you confirm if they have been signed?

I have received a Verify message on Friday Dec 16th stating "Certificate Number DVWXJ02.03UA-006 with Evaporative Family DVWXR0110D38 has been issued" and received the certificate linked in the message.

Missing certificates:

I have received a Verify message on Friday Dec 16th stating "The certificate request for Test Group DVWXJ02.03UA and Evaporative Family DVWXR0125241 has been approved and is now waiting to be signed". No message has been received confirming the certificate was signed (as seen above).

Verify Transaction Identifier: \_4d33228b-39a0-4f2c-a297-ed83c57bb658

I have received a Verify message on Friday Dec 16th stating "The certificate request for Test Group DVWXJ02.03UA and Evaporative Family DVWXR0125D46 has been approved and is now waiting to be signed". No message has been received confirming the certificate was signed (as seen above).

Verify Transaction Identifier: \_3e284f93-b528-4e5f-bf53-9c67ce7302a9

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 12/19/2011 6:37:59 PM  
**Subject:** RE: VW Group - 2013MY Certificates MIA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks Jim,

I will check Verify again later and contact the help desk if necessary.

Please let us know as soon as you have an indication on a Shed retest date for the Q5 Hybrid.

Regards,

Bill Rodgers

Emissions Certification Engineer

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office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, December 19, 2011 1:24 PM  
To: Rodgers, William  
Subject: Re: VW Group - 2013MY Certificates MIA

According Verify they were signed 12/16. I don't know why you didn't a confirmation note but they look okay in Verify.

On another note , I just found out that there was a problem with the Shed over the w/e and the test voided.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 12/19/2011 10:07 AM  
Subject: VW Group - 2013MY Certificates MIA

Hello Jim,  
Thanks for processing our 2013MY certificates last Thursday. The following two certificates are still Missing in Action. Can you confirm if they have been signed?

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I have received a Verify message on Friday Dec 16th stating "The certificate request for Test Group DVWXJ02.03UA and Evaporative Family DVWXR0125D46 has been approved and is now waiting to be signed". No message has been received confirming the certificate was signed (as seen above).

Verify Transaction Identifier: \_3e284f93-b528-4e5f-bf53-9c67ce7302a9

Thanks,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 12/20/2011 7:18:11 PM  
**Subject:** RE: VW Group - 2013MY Certificates MIA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks Jim.

So far, the certificates have not shown up as new messages or in the originals. I'll keep you posted if/when the help desk finds something.

Any idea yet when the Q5 Hybrid will retest in the shed? I'm curious to know if we need to leave it there over the holidays or should expect to pick it up.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, December 20, 2011 1:09 PM  
To: Rodgers, William  
Subject: RE: VW Group - 2013MY Certificates MIA

Bill, we've found 2 other manufacturers who didn't get notification of their certificates. Check if they are in your CDX folder and let me know if you hear anything from The help desk. Meanwhile I can send you copies of the certificates to your email.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 12/19/2011 01:38 PM  
Subject: RE: VW Group - 2013MY Certificates MIA

Thanks Jim,  
I will check Verify again later and contact the help desk if necessary.

Please let us know as soon as you have an indication on a Shed retest date for the Q5 Hybrid.

Regards,

Bill Rodgers  
Emissions Certification Engineer

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Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
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office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, December 19, 2011 1:24 PM  
To: Rodgers, William  
Subject: Re: VW Group - 2013MY Certificates MIA

According Verify they were signed 12/16. I don't know why you didn't a confirmation note but they look okay in Verify.

On another note , I just found out that there was a problem with the Shed over the w/e and the test voided.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 12/19/2011 10:07 AM  
Subject: VW Group - 2013MY Certificates MIA



Hello Jim,

Thanks for processing our 2013MY certificates last Thursday. The following two certificates are still Missing in Action. Can you confirm if they have been signed?

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Verify Transaction Identifier: \_4d33228b-39a0-4f2c-a297-ed83c57bb658

I have received a Verify message on Friday Dec 16th stating "The certificate request for Test Group DVWXJ02.03UA and Evaporative Family DVWXR0125D46 has been approved and is now waiting to be signed". No message has been received confirming the certificate was signed (as seen above).

Verify Transaction Identifier: \_3e284f93-b528-4e5f-bf53-9c67ce7302a9

Thanks,

Bill Rodgers

Emissions Certification Engineer

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office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Tue 1/3/2012 9:40:22 PM  
**Subject:** VW Group - ORVR Information MY2013 Jetta Hybrid 1.4L

Hello Jim,

I hope you had a good holiday break and new year, and are looking forward to a great 2012!

Just so you are aware, today we submitted a ORVR document for the 2013 Jetta Hybrid for your review.  
Please let me know if you have any questions.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 1/4/2012 7:10:39 PM  
**Subject:** VW Group - Decision Information for VID VW462\_8-0062\_08\_2  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted new FEDV tests and the decision information to Verify for the VID: VW462\_8-0062\_08 Configuration 2. A manufacturer retest is required for the Highway test due to High Fuel Economy for the ETW.

These new tests and VID configuration are being used for the 2013 Volkswagen CC 2.0 TFSI manual 6-speed which was recently certified in the carryover test group DVWXJ02.03UA. The new data is due to a transmission final drive gearing change effective at the start of 2013 production. It was initially expected that this change would happen later in the year, but instead it will be in place for the entire production run. A revised Initial Application has been uploaded to Verify to reflect the change.

A similar notice is forthcoming for the Bin 3 / PZEV version of this model in test group DVWXV02.03PA.

Regards,

Bill Rodgers

Emissions Certification Engineer

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Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 1/5/2012 4:57:32 PM  
**Subject:** RE: VW Group - Decision Information for VID 464\_00042  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted the last decision information today and the revised application is forthcoming related to the change described below in my previous message. This submission is for the Volkswagen VID 464\_00042, configuration 1. A manufacturer retest is required for the Highway test due to High Fuel Economy for the ETW.

These tests are being used to represent the T2B3/ SULEV2 version of the 2013 Volkswagen CC 2.0 TFSI manual 6-speed. The same final drive ratio change applies as described below. Please provide your decision for both at your earliest convenience.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

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office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

From: Rodgers, William  
Sent: Wednesday, January 04, 2012 2:11 PM  
To: 'Jim Snyder'  
Cc: Giles, Michael; Hart, Robert (VWoA)  
Subject: VW Group - Decision Information for VID VW462\_8-0062\_08\_2

Hello Jim,

I submitted new FEDV tests and the decision information to Verify for the VID: VW462\_8-0062\_08 Configuration 2. A manufacturer retest is required for the Highway test due to High Fuel Economy for the ETW.

These new tests and VID configuration are being used for the 2013 Volkswagen CC 2.0 TFSI manual 6-speed which was recently certified in the carryover test group DVWXJ02.03UA. The new data is due to a transmission final drive gearing change effective at the start of 2013 production. It was initially expected that this change would happen later in the year, but instead it will be in place for the entire production run. A revised Initial Application has been uploaded to Verify to reflect the change.

A similar notice is forthcoming for the Bin 3 / PZEV version of this model in test group DVW XV02.03PA.

Regards,

Bill Rodgers

Emissions Certification Engineer

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3800 Hamlin Rd.

Auburn Hills, MI 48436

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office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Lynn Sohacki/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Mon 1/9/2012 1:12:51 PM  
**Subject:** VW Group - ORVR Information MY2013 Jetta Hybrid 1.4L  
CBI\_DVWXR0110PHE\_RFA\_ORV\_R00.PDF

Hello Lynn,

I was asked by my colleague (Bob Hart) to send you copies of our ORVR submissions. The attachment was recently submitted to Jim Snyder through Verify.

Please call me if you have any questions about this.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 1/9/2012 7:25:41 PM  
**Subject:** VW Group Decision Information - VID: VW324-1-0132, VW324-1-240\_12  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted the following test decision information's to you today. See the decision information comments for detailed explanations. None involve new technology or manufacturer retests.

VID: VW324-1-0132 Configuration 1, for running change adding 2012 Beetle Convertible 2.5L-automatic (T2B5).

VID: VW324-1-240/12 Configuration 2, for running change adding 2012 Beetle Convertible 2.5L-automatic (T2B3/SULEV).

VID: VW324-1-240/12 Configuration 3, for 2013 Passat Cold CO.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

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office (248) 754-4219

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 1/9/2012 7:27:05 PM  
**Subject:** VW Group - Audi Q5 Hybrid

Hi Jim,

Any shed results yet for last week's test?

Bill

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/10/2012 12:52:03 PM  
**Subject:** RE: CHUB-Q5A Laboratory Data  
[CHUB-Q5A 01-06-2-12 Evap.pdf](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Good morning Bill,

Happy New Year to you! I'm sorry getting this test data to you took soooooo long. Enclosed are the 3 bag FTP and Evap Laboratory results for the Subject vehicle. As always, if you have any questions or concerns, please contact me.

Thanks for you patience!

Best regards,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/12/2011 01:24 PM  
Subject: RE: CHUB-Q5A Laboratory Data

Hello Vince,

I saw the test results on Verify. Would you mind sending the lab results pages? They are much easier to digest.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]

Sent: Friday, December 09, 2011 1:04 PM

To: Rodgers, William

Cc: Snyder.Jim@epamail.epa.gov

Subject: Re: CHUB-Q5A Laboratory Data

Hello Bill,

I checked again after lunch and nothing yet. My guess is Monday. Hybrids still take longer. I'll keep on looking though and forward the data as soon as I get it.

Best regards,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>

To: Vincent Mazaitis/AA/USEPA/US@EPA

Date: 12/09/2011 10:04 AM

Subject: CHUB-Q5A Laboratory Data

Hello Vince,

Have you received any lab test data from yesterday's Audi Q5 Hybrid test? If you could scan and email it to my when you receive it I would appreciate it.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**Variable Temperature SHED Report****Test: 72 °F - 96 °F for 48 Hours****Test No: 2011-0324-017****Mfr: 00640 VID: CHUB-Q5A Config: 00**

Test Purpose	1	VTSHED#	VT2
Test Procedure	23	Cert Flag	Y
Fuel Type	61 Tier 2 Cert Test Fu	Requester	Jim Snyder
Technician_Name	62546	Validators Initials	<u>PDV</u>

**DIURNAL AND TOTAL EVAPORATIVE EMISSIONS**


Started (D@T)	2012/01/06 @ 06:46	Finished (D@T)	2012/01/08 @ 06:47
Start Temp (°F)	72.00	Test Length (hrs)	48
Day 1 Total (gHC)	0.358791	Diurnal (gHC)	0.358791
Day 2 Total (gHC)	0.277682	Hot_Soak_HC_(g)	0.053947
Day 3 Total (gHC)	N/A	Total Emissions (gHC)	<b>0.412739</b>

**QUALITY CONTROL CHECKS**

- ☒ 1. Was the Vehicle Soak-Time greater than or equal to 6?  
The Vehicle Soak-Time was 19:21:40.
- ☒ 2. Was the Vehicle Soak-Temperature during the final 6 hours 72 +/- 3 °F?  
The largest Vehicle Soak-Temperature deviation during the final 6 hours was 71.85 °F.
- ☒ 3. Was the Time-Difference between closing & sealing the SHED 0 +/- 5 min?  
The Time-Difference between closing & sealing the SHED was 0.00 min.
- ☒ 4. Was the SHED Feedback minus Setpoint Temperature (Underbody) 0 +/- 3 °F?  
The difference was 0.62 °F.
- ☒ 5. Was the Average of SHED Feedback minus SHED Setpoint Temperature 0 +/- 2 °F?  
The difference was 0.15 °F.
- ☒ 6. Was the Average Left & Right Sidewall minus SHED Setpoint Temperature 0 +/- 5 °F?  
The difference was 1.73 °F.
- ☐ 7. Was the Cold-Water-In-Temp greater than or equal to 40 °F?  
The Minimum Cold-Water-In-Temp was 59.22 °F.
- ☒ 8. Was the Inside versus Outside Differential Pressure 0 +/- 2 inH2O?  
The Differential-Pressure at its largest deviation was 0.21 inH2O.
- ☒ 9. Was the 1-day HC-Value taken at 1440 +/- 6 min?  
The 1-day HC-Value was taken at 1440.15 min.
- ☒ 10. Was the 2-day HC-Value taken at 2880 +/- 6 min?  
The 2-day HC-Value was taken at 2880.15 min.

FTP TID: 018 - Hot Soak TID: 018 - VERIFY Status: Unknown

**QC Note: All Automated Quality Checks Passed**

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0324-018				Vehicle ID: CHUB-Q5A			
	<b>Test Information</b>			<b>Test Date:</b> 1/5/2012			
	<b>Key Start / Hot Soak:</b> 08:33:42 / 09:51			<b>MFR Name:</b> AUDI			
	<b>Fuel Container ID:</b> F00023			<b>MFR Codes:</b> 640 ADX			
	<b>Fuel Type:</b> 61 Tier 2 Cert Test Fuel			<b>Config #:</b> 00			
	<b>Test Procedure:</b> 21 Federal fuel 2-day exhaust (w/can loa)			<b>Transmission:</b> S			
	<b>Calculation Method:</b> Gasoline			<b>Shift Schedule:</b> A09980005			
<b>Pretest Remarks:</b>				<b>Beginning Odometer:</b> 005050.0 MI			
				<b>Drive Schedule:</b> ftp3bag			
				<b>Soak Period:</b> 18.6 hours			
<b>Bag Data</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
<b>Phase 1</b>							
Sample		6.549	28.345	1.441	1.001	2.834	
Ambient		2.624	0.000	0.014	0.044	2.062	
Net Concentration		4.121	28.345	1.428	0.960	0.926	3.024
Remarks:							
<b>Phase 2</b>							
Sample		2.673	7.033	0.455	0.496	2.027	
Ambient		2.652	0.000	0.019	0.043	2.067	
Net Concentration		0.120	7.033	0.437	0.455	0.036	0.077
Remarks:							
<b>Phase 3</b>							
Sample		2.762	25.358	0.370	0.798	2.080	
Ambient		2.647	0.000	0.022	0.044	2.081	
Net Concentration		0.273	25.358	0.349	0.756	0.123	0.128
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
Remarks: This test has SHED results. SHED Test Number = 2011-0324-018							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.053	0.735	0.055	391.2	0.014	0.039 / 0.040	22.739
Phase 2	0.002	0.289	0.027	294.1	0.001	0.002 / 0.002	30.304
Phase 3	0.003	0.655	0.013	306.9	0.002	0.002 / 0.002	28.987
Weighted	0.01317	0.48189	0.02883	317.671	0.00379	(NMOG=1.04xNMHC) 0.0093 / 0.0097	
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>				<u>Dyno #:</u> D329 - AWD	
Phase 1	22.69	3 bag Hybrid test for evap OB 1-9-12				Inertia: 4750	
Phase 2	30.23					EPA Set Co A: -9.61	
Phase 3	28.92					EPA Set Co B: -0.164	
Weighted	27.93					EPA Set Co C: 0.02573	
						Emiss-Bench: Mexa 7200sle	



# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-018

Vehicle ID: CHUB-Q5A

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.189	2.628	0.196	1399.2	0.049	0.139	1.185
Phase 2	0.009	1.117	0.103	1134.7	0.003	0.006	
Phase 3	0.013	2.347	0.048	1100.0	0.007	0.006	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.01	29.00	29.00	
Avg Cell Temp (degF)	75.23	75.27	75.33	
Dew Point (degF)	48.28	48.32	48.25	
Specific Humidity (grains/lbm)	51.77	51.85	51.73	
NOx Corr Factor	0.9016	0.9019	0.9014	
CO2 Dilution Factor	13.344	26.946	16.742	
CFV Vmix (scf @68F)	2812.48	4817.24	2807.46	
CVS Flow Rate Avg (scfm)	332.71	332.41	332.51	
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	507.20	869.50	506.60	
Distance (miles)	3.577	3.859	3.584	
Bag Analysis Time (secs)	879.0	1112.1	160.6	

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0163	0.51	0.03	306	0	0.0136

Odometer  
4448 M

MPG  
29

MPG is 3.82 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 1/10/2012 2:55:36 PM  
**Subject:** VW Group - Audi Q5 Hybrid standards

Hi Jim,

As a follow up to your call, the Q5 Hybrid Evap standards in Verify are incorrectly stated as LDT (6,001-8,500 GVWR standards). I will update Verify to reflect the correct LDT (6,000 GVWR and under) standards. It also looks like I need to correct the curb weight in Section 12 of the application so I will include that in the revised application. Thanks for the feedback.

Bill

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 1/10/2012 3:53:50 PM  
**Subject:** RE: VW Group - Audi Q5 Hybrid standards

Hi Jim,

We have confirmed that the test data is acceptable, please release the vehicle for pick-up.

My message below regarding the standards in Verify is incorrect. After further investigation, I found that the Evap standards in the Verify system test group information were corrected on October 13, 2011 to reflect the LDT (6,000 GVWR and under) standards. At that time we submitted a revised Initial Application with new Sec. 7 CSI named CBI\_CADXT02.0HUB\_APP\_INI\_R01.PDF. It appears the erroneous information you have is based on the initial submission.

Thanks,

Bill

From: Rodgers, William  
Sent: Tuesday, January 10, 2012 9:56 AM  
To: 'Jim Snyder'  
Subject: VW Group - Audi Q5 Hybrid standards

Hi Jim,

As a follow up to your call, the Q5 Hybrid Evap standards in Verify are incorrectly stated as LDT (6,001-8,500 GVWR standards). I will update Verify to reflect the correct LDT (6,000 GVWR and under) standards. It also looks like I need to correct the curb weight in Section 12 of the application so I will include that in the revised application. Thanks for the feedback.

Bill

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Wed 1/11/2012 8:02:00 PM  
**Subject:** CHUB-Q5

Hello Jim,

The corrected Evap results are in Verify. It did not/does not erase or change the initial entry.

Thanks,

Vince Mazaitis

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Thomas, Suanne" [Suanne.Thomas@vw.com]; Thomas, Suanne" [Suanne.Thomas@vw.com]; Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/17/2012 2:03:03 PM  
**Subject:** RE: VW Group - OBD Approval Request DVW-I5 (Federal Only)

Michael,

Please provide OBD threshold test results from the new 2013 OBD system. Since this is a carry-over system, and you have removed the secondary air system, which can significantly reduce the tailpipe emission levels, the emission and OBD threshold data generated for the 2012 system is no longer valid.

Please provide documentation showing that new OBD threshold data was generated for each of the major monitors without the secondary air system and that the MIL set for those monitors at or below the 1.5x threshold. Provide detailed test data including test vehicle IDs, test numbers and test dates that the OBD data was generated. (This can be in table form, doesn't have to be actual dyno data).

Once you can show me that all new OBD threshold testing data was generated for this new system, I won't have any issues approving this OBD system.

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: "Giles, Michael" <michael.giles@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: "Thomas, Suanne" <Suanne.Thomas@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 01/10/2012 03:24 PM  
Subject: RE: VW Group - OBD Approval Request DVW-I5 (Federal Only)

Hello Bob,

Could you please give us a status report for this Federal OBD approval request? We are just trying to monitor the timing for all of our open requests.

Thanks,  
Mike

From: Giles, Michael  
Sent: Friday, November 18, 2011 2:37 PM  
To: (Peavyhouse.Robert@epamail.epa.gov)  
Cc: Thomas, Suanne; Rodgers, William; Hart, Robert (VWoA)

Subject: VW Group - OBD Approval Request DVW-I5 (Federal Only)

Hello Robert,

Attached, please find a PDF file with carryover OBD description (approval request) for MY 2013 Volkswagen OBD Group DVW-I5 (Federal), submitted for your approval.

Please note, this approval request corresponds to 2 test groups: DVWXV02.5A35 (automatic trans) and DVWXV02.5M35 (manual). The models involved are Passat, Jetta, Jetta SportWagen, Golf, Beetle, Beetle Convertible.

Also, two copies of this document have been uploaded today to VERIFY (same document, but one was renamed to cover each of the test groups).

Please review for approval and send your feedback or any questions you may have at your earliest convenience.

Regards,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Thomas, Suanne" [Suanne.Thomas@vw.com]; Thomas, Suanne" [Suanne.Thomas@vw.com]; Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Tue 1/17/2012 3:32:44 PM  
**Subject:** RE: VW Group - OBD Approval Request DVW-I5 (Federal Only)  
<http://www.epa.gov/nvfel/>

Hello Robert,

I forwarded your questions to our colleagues in Germany and will reply with their feedback as soon as it is received.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

From: Robert Peavyhouse [mailto:Peavyhouse.Robert@epamail.epa.gov]  
Sent: Tuesday, January 17, 2012 9:03 AM  
To: Giles, Michael

Cc: Jim Snyder; Thomas, Suanne; Rodgers, William; Hart, Robert (VWoA)  
Subject: RE: VW Group - OBD Approval Request DVW-I5 (Federal Only)

Michael,

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Robert Peavyhouse  
Compliance and Innovative Strategies Division  
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phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: "Giles, Michael" <michael.giles@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: "Thomas, Suanne" <Suanne.Thomas@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 01/10/2012 03:24 PM  
Subject: RE: VW Group - OBD Approval Request DVW-I5 (Federal Only)

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Thanks,  
Mike

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Sent: Friday, November 18, 2011 2:37 PM  
To: (Peavyhouse.Robert@epamail.epa.gov)  
Cc: Thomas, Suanne; Rodgers, William; Hart, Robert (VWoA)  
Subject: VW Group - OBD Approval Request DVW-I5 (Federal Only)



Hello Robert,

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Please note, this approval request corresponds to 2 test groups: DVWXV02.5A35 (automatic trans) and DVWXV02.5M35 (manual). The models involved are Passat, Jetta, Jetta SportWagen, Golf, Beetle, Beetle Convertible.

Also, two copies of this document have been uploaded today to VERIFY (same document, but one was renamed to cover each of the test groups).

Please review for approval and send your feedback or any questions you may have at your earliest convenience.

Regards,  
Mike

Michael Giles  
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Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 1/19/2012 1:38:58 PM  
**Subject:** FW: VW Group - EPA test resubmission  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

Just FYI.

Regards,

Bill

From: Rodgers, William  
Sent: Wednesday, January 18, 2012 11:07 AM  
To: 'Peavyhouse.Robert@epamail.epa.gov'  
Cc: Giles, Michael; Hart, Robert (VWoA)  
Subject: VW Group - EPA test resubmission

Hello Bob,

The following EPA confirmatory test needs to be resubmitted in order to process a particular 2012 test group file.

Test Number: BVWX91000704

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

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Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** [REDACTED] Ex. 7  
**Sent:** Wed 1/25/2012 4:01:31 PM  
**Subject:** Verify Alternate Manuf.docx  
Verify Alternate Manuf.docx

Hi Jim,

Here is how Verify is set up for VW Alternate Manufacturers. You will notice that a VW is set up to allowing Porsche access test data for the test group/Evap family listed only. Audi and Bugatti get general access by model year.

Hope this helps.

[REDACTED] Ex. 7

PS - [REDACTED] Ex. 7 has a (May?) 2011 EPA presentation on Stop-start he will forward to you.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 1/25/2012 6:14:51 PM  
**Subject:** VW Group - Decision Information  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted the T2B5/ULEV VW CC tests and Decision Information we discussed this morning regarding a test data resubmission as 2013 model year, intended to replace the 2008 model year data you previously waived. The new Vehicle ID is: VW462 8-0062/13\_Configuration 0. Please waive the confirmatory testing so I can enter the manufacturer confirmatory HWY test we did.

There will be another similar resubmission coming for the corresponding T2B3/SULEV version of this car.

Thanks,

Bill Rodgers

Emissions Certification Engineer

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Engineering and Environmental Office

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Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 1/25/2012 7:45:02 PM  
**Subject:** RE: VW Group - Decision Information  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

The Decision Information for the T2B3 version was submitted as mentioned below. Please waive these also.

Vehicle ID: 464 00042/13, Configuration 0

Hopefully, I can avoid doing this again!

Bill

From: Rodgers, William  
Sent: Wednesday, January 25, 2012 1:15 PM  
To: 'Jim Snyder'  
Cc: Giles, Michael  
Subject: VW Group - Decision Information

Hello Jim,

I submitted the T2B5/ULEV VW CC tests and Decision Information we discussed this morning regarding a test data resubmission as 2013 model year, intended to replace the 2008 model year data you previously waived. The new Vehicle ID is: VW462 8-0062/13\_Configuration 0. Please waive the confirmatory testing so I can enter the manufacturer confirmatory HWY test we did.

There will be another similar resubmission coming for the corresponding T2B3/SULEV version of this car.

Thanks,

Bill Rodgers

Emissions Certification Engineer

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Engineering and Environmental Office

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Fri 2/3/2012 3:43:05 PM  
**Subject:** VW Group Decision Infomration - Lamborghini

Hello Jim,

Today we submitted Decision requests for vehicles within 2 Lamborghini test groups. A summary of the veh/config. submissions is listed below. Please advise of confirmatory decisions at your earliest convenience or call me if you have questions.

Best regards,

Mike

Test Group Configuration	Test Group Description Description	Vehicle ID /
DNLXV06.5L830	Aventador Roadster / Coupe with start / stop technology Aventador Roadster with start / stop	LB83-DSSCD /
DNLXV06.5L831	Aventador Roadster / Coupe with start / stop technology Aventador Coupe with start / stop	LB83-DSSCD /

Test Group Configuration	Test Group Description Description	Vehicle ID /
DNLXV06.55LX0	Aventador Roadster / Coupe with FFV Technology Aventador Roadster with FFV (gasoline tests)	LB83-DFFV/
DNLXV06.55LX2	Aventador Roadster / Coupe with FFV Technology Aventador Roadster with FFV (ethanol tests)	LB83-DFFV/
DNLXV06.55LX1	Aventador Roadster / Coupe with FFV Technology Aventador Coupe (FEDV) with FFV (gasoline tests)	LB83-DFFV/
DNLXV06.55LX3	Aventador Roadster / Coupe with FFV Technology Aventador Coupe (FEDV) with FFV (ethanol tests)	LB83-DFFV/

Michael Giles

Certification Specialist

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Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 2/6/2012 11:32:28 PM  
**Subject:** Re: VW Group - Lamborghini Start-Stop Questions  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**Ex. 6**

call Steve Healy if any questions. x4121

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William" <William.Rodgers@vw.com>  
**Cc:** "Giles, Michael" <michael.giles@vw.com>  
**Date:** 02/06/2012 06:27 PM  
**Subject:** Re: VW Group - Lamborghini Start-Stop Questions

Since the default is enabled, it resets to enabled, and its a low volume Lamborghini, I don't see a need to test with it disabled. If this was a more typical volume vehicle I would first require more info on the enablement parameters and that you to bring a sample vehicle for us to evaluate (like the Audis).

I would still like a list from them of the parameters and settings that enable/disable the feature.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>  
**Date:** 02/06/2012 08:52 AM  
**Subject:** VW Group - Lamborghini Start-Stop Questions

Hello Jim,

**Ex. 6**

I am forwarding this information in reply to your questions regarding the Lamborghini Aventador with Start&Stop technology, test group DNLXV06.5L83.

We have confirmed the following:

- 1) Production vehicles will have a button to deactivate/activate the Start&Stop operation on the driver command.
- 2) The strategy is DEFAULT ON (i.e. every time you start the engine, the Start&Stop system is enabled, independently on the status at key off).
- 3) The test vehicle is a pre-production unit and does not have the button installed, it is instead programmed to remain in Start&Stop ON mode. This is based on the expectation that tests are to be performed in that mode. If you chose to confirm this vehicle, please let us know if it is vital that a driver activated switch be installed in the test vehicle?

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/17/2011 9:09:46 PM  
**Subject:** Re: 2.0L TDI - Volkswagen Requests for Approval  
[2012 VW DPF factor approval request.pdf](#)  
[VW 2012 2.0L TDI SCR AECD request.pdf](#)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA, <[Ex. 7]@arb.ca.gov>  
**Date:** 03/16/2011 03:03 PM  
**Subject:** 2.0L TDI - Volkswagen Requests for Approval

Hello Jim and [Ex. 7]

Just a heads-up. I have submitted a request for approval of the upward and downward DPF regeneration adjustment factors for the 2012 model year 2.0L TDI test group CVWXV02.0U4S. The request was submitted to EPA and ARB through VERIFY and DMS respectively. These factors are determined as we have done so in the past for our DPF-equipped diesels.

Your attention to this matter would be appreciated. I would also appreciate an update on the status of the review of the SCR/AECD submittal for this test group.

Best regards,

[Ex. 7]

---

**Ex. 7**

Engineering and Environmental Office  
Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: [Ex. 7]@vw.com

# VOLKSWAGEN

GROUP OF AMERICA

REVIEWED AND ACCEPTED  
DATE 3/17/2011 EPA REP *J. Singh*

Mr. Linc Wehrly  
Manager  
Compliance and Innovative Strategies Division  
U.S. Environmental Protection Agency  
2000 Traverwood  
Ann Arbor, Michigan 48105

**Ex. 7**

Name  
Title  
EEO Department  
Phone  
Fax  
E-Mail

**Ex. 7**

**Ex. 7**

@vw.com

**Ex. 7**

March 16, 2011 Date

Mobile Source Operations Division  
California Air Resources Board  
9528 Telstar Avenue  
El Monte, California 91731

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Subject: Test Group CVWXV02.0U4S – Request for Approval; Engineering  
Evaluation for Exhaust Emission Adjustment Factors

Dear Mr. Wehrly and

**Ex. 7**

Volkswagen Group of America, Inc. ("Volkswagen") herewith submits for your review, a request for approval of an engineering evaluation for the development of exhaust emission adjustment factors. These adjustment factors would apply for certification and OBD demonstration for the 2.0L Turbocharged Direct Injection (TDI) Common Rail Diesel (Test Group: CVWXV02.0U4S).

This vehicle concept represented by this test group employs a diesel particulate filter (DPF) that experiences periodic regeneration. As such, adjustment factors have been determined to account for the regeneration of the DPF, if such an event does not occur during the course of an emission test (upward adjustment factor, or UAF) and when the regeneration of the DPF occurs during an emission test (downward adjustment factor, or DAF).

We look forward to your response.

Best regards,  
VOLKSWAGEN GROUP OF AMERICA, INC.

**Ex. 7**

Enclosure

# VOLKSWAGEN

GROUP OF AMERICA

REVIEWED AND ACCEPTED

DATE 3/17/2011 BY J. Saylor

Mr. Linc Wehrly  
Manager  
Compliance and Innovative Strategies Division  
U.S. Environmental Protection Agency  
2000 Traverwood  
Ann Arbor, Michigan 48105

**Ex. 7**

Mobile Source Operations Division  
California Air Resources Board  
9528 Telstar Avenue  
El Monte, California 91731

**Ex. 7**

Name  
Title

EEO Department

**Ex. 7**

Phone  
Fax

**Ex. 7** @vw.com E-Mail

February 7, 2011 Date

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

Subject: Test Group CVWXV02.0U4S – Request for Approval; Selective Catalytic Reduction System and AECD Description

Dear Mr. Wehrly and **Ex. 7**

Volkswagen Group of America, Inc. ("Volkswagen") herewith submits for your review, a request for approval of a Selective Catalytic Reduction (SCR) emission control system strategy and Auxiliary Emission Control Device (AECD) description. This request and the enclosed documentation pertain to the following vehicle application:

Model Year	Test Group	Engine Description	Vehicle Model
2012	CVWXV02.0U4S	2.0L Turbocharged Direct Injection (TDI) Common Rail Diesel	Volkswagen Passat (New Midsize Sedan)

The information regarding SCR is prepared and submitted in accordance with the provisions of United States Environmental Protection Agency Guidance Document Cisd-07-07. As you may recall, the 2010 and 2011 model year Volkswagen Touareg and Audi Q7 models, equipped with the 3.0L TDI diesel engine, have been certified with an SCR emission control system. The basic function, including the driver inducement strategy, for this 2.0L TDI application, parallels the previously-approved system.

In addition to the SCR description, Volkswagen is providing for your review, preliminary pages from the application for certification of the subject test group, which identify and describe AECDs, including emission increasing AECDs (EI-AECD).

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/17/2011 10:28:57 PM  
**Subject:** Re: Lamborghini Revised Certificate Request - CNLXV06.5L83

Mike, I have looked at the application some more. Looks in order overall but I don't recall noticing before the continued use of the config with 5th and 6th cats in the previous Part 1. For clarification, can you find out what is the difference between the L539 and L539A -besides the cats? Are they planning to even build the L539? Or maybe they built a few before the running change?

The emissions data in the part 1 and the cert application were run at the end of 2010 (except a test dated 1/12/2010, a typo?) but the Config lists the "L539" engine. See if you can find out if the data is from the L539 or L539A. It should be worst case emissions.

I'll be back monday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 03/17/2011 07:33 AM  
Subject: Lamborghini Revised Certificate Request - CNLXV06.5L83

Hello Jim,

As a follow up to our discussion, I have submitted a request for a "new" certificate for the above test group (although it should be a revision - "new" was the only option). Please let me know if you received this, since I have not received a confirmation email.

To summarize the reasons for the revised certificate request:

- 1) Name change from 834 to Aventador
- 2) New catalyst configuration (there will now be both 4 and 6 catalysts configurations).

Thanks for your help, please call me if you have any questions.

Thanks,  
Mike

Michael Giles  
Certification Specialist



Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/22/2011 12:48:30 PM  
**Subject:** Re: Lamborghini Revised Certificate Request - CNLXV06.5L83

Let me know if I need to deny the certificate request fro you to revise it. didn't want to reject it if not needed.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/22/2011 6:04:44 PM  
**Subject:** Fw: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

**Ex. 7** [Ex. 7]  
[Ex. 7]

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 03/22/2011 02:04 PM -----

**From:** Ben Haynes/AA/USEPA/US  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 03/22/2011 01:48 PM  
**Subject:** Re: Fw: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

I have moved this vehicle to 18May11.

Ben

**From:** Jim Snyder/AA/USEPA/US  
**To:** Ben Haynes/AA/USEPA/US@EPA  
**Date:** 03/22/2011 12:54 PM  
**Subject:** Fw: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Ben, this is the vehicle that is delayed and requested to be pulled from schedule. They'd like it scheduled near the diesel 411 10208 /12.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 03/22/2011 12:51 PM -----

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** [Ex. 7]@vw.com>, [Ex. 7]@vw.com>, [Ex. 7]@vw.com>  
**Date:** 03/22/2011 12:14 PM

Subject: RE: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Hi Jim,

As a follow up to my phone message. We are requesting that the below mentioned confirmatory test be rescheduled for May 18, 2011 or during that week if possible.

Regards,

**Ex. 7**

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States

**Ex. 7**

@vw.com

From: **Ex. 7**

Sent: Monday, March 21, 2011 8:49 AM

To: Snyder, Jim

Cc: **Ex. 7**

Subject: VW Group - EPA Confirmatory Test Vehicle ID: 411 10206 /12

Hello Jim,

We are experiencing delays in getting the following vehicle shipped to the US and would like to request it be temporarily removed from the confirmatory test schedule until we can confirm an arrival date. We will contact you as soon as we know more so a new test date can be scheduled.

Vehicle ID: 411 10206 /12

Vehicle Configuration #: 0

Test Group Name: CVWXXV03.6U41

Current test date: 03-28-2011

Best regards,

**Ex. 7**

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States

**Ex. 7**

@vw.com

/ \_ \.  
(o\ \_ /o)

**To:** [Ex. 7]@vw.com]  
**Cc:** CN=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 4/13/2011 9:37:38 PM  
**Subject:** RE: Lambo ADP

[Ex. 7] are you available for a short phone conference tomorrow sometime between 9:30 and 1:00?

We have some questions on which vehicles are using vehicle aging, VW bench aging, and Lambo bench aging for 2011 and 2012. do you have a table or chart like that?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA  
**Date:** 04/13/2011 04:21 PM  
**Subject:** RE: Lambo ADP

Hello Jim and Arvon:

(Arvon – I left a telephone message with you a earlier today.)

I would appreciate an update on the status of the Lamborghini Bench Test request for approval. This topic has become somewhat urgent.

Best regards,

**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office  
Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: [Ex. 7]@vw.com

**From:** [Ex. 7]  
**Sent:** Friday, April 01, 2011 8:30 AM  
**To:** 'Snyder.Jim@epamail.epa.gov'

Subject: RE: Lambo ADP

Hi Jim:

Great. Thanks for the follow-up.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]

Sent: Thursday, March 31, 2011 5:22 PM

To: **Ex. 7**

Subject: Lambo ADP

I talked to Arvon about the Lambo ADP. He seemed agreeable to it so you may hear from him soon.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** [Ex. 7]@vw.com]  
**Cc:** CN=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA; [Ex. 7]  
[Ex. 7]@vw.com]; [Ex. 7]@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 4/14/2011 3:37:29 PM  
**Subject:** RE: Lambo ADP  
<mailto:Snyder.Jim@epamail.epa.gov>

Thanks for the note clarifying the various methods used. Arvon and I discussed it and agreed that you are okay. He will send VW and Lamborghini a formal letter of approval but you can submit cert requests before then too.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA  
**Cc:** [Ex. 7]@vw.com>  
**Date:** 04/14/2011 10:44 AM  
**Subject:** RE: Lambo ADP

Hello Jim and Arvon:

I am available between 11 AM and 3 PM today. Do you have specific questions regarding the Lamborghini submission? If so I can try to tie in the Lamborghini folks. You may recall that they volunteered to have a conference call.

Regarding the durability procedures used for MY 2011 and 2012, there are charts in Section 4 of the Common Section that identify the durability procedure used for each test group. For these model years, the general breakdown is essentially the same and is described below:

1. The majority of the test groups use the Volkswagen Alternate Durability Procedure (VWADP), which is a whole-vehicle, accelerated durability procedure that has been used for a number of years.
2. The Diesel test groups (2.0L TDI and 3.0L TDI), use the Standard Road Cycle.
3. EPA assigned DFs are used for three limited production concepts; namely the Bentley 63/4L Mulsanne, the Lamborghini V-12 Aventador, and the Bugatti.

Lamborghini is requesting approval of a bench cycle for use with a forthcoming 2012 test group.

At one point, we presented a Volkswagen Bench Cycle; however, this procedure is not used at the moment. There is a reference to this procedure in the Lamborghini Bench Cycle request, for comparison purposes. In addition, we have presented a Bench Cycle for diesels, but again, we are not there yet.

If you would like a list summarizing the application of the procedures, please let me know.



Best regards,

**Ex. 7**

**Ex. 7**

Engineering and Environmental Office  
Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7**@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, April 13, 2011 5:38 PM  
To: **Ex. 7**  
Cc: Mitcham.Arvon@epamail.epa.gov  
Subject: RE: Lambo ADP

**Ex. 7** are you available for a short phone conference tomorrow sometime between 9:30 and 1:00?

We have some questions on which vehicles are using vehicle aging, VW bench aging, and Lambo bench aging for 2011 and 2012. do you have a table or chart like that?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: **Ex. 7**@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA  
Date: 04/13/2011 04:21 PM  
Subject: RE: Lambo ADP

Hello Jim and Arvon:

(Arvon – I left a telephone message with you a earlier today.)

I would appreciate an update on the status of the Lamborghini Bench Test request for approval. This topic has become somewhat urgent.

Best regards,

**Ex. 7**

---

**Ex. 7**

Engineering and Environmental Office  
Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7**@vw.com

From: **Ex. 7**  
Sent: Friday, April 01, 2011 8:30 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: RE: Lambo ADP

Hi Jim:

Great. Thanks for the follow-up.

**Ex. 7**

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, March 31, 2011 5:22 PM  
To: **Ex. 7**  
Subject: Lambo ADP

I talked to Arvon about the Lambo ADP. He seemed agreeable to it so you may hear from him soon.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 4/27/2011 8:25:42 PM  
**Subject:** Re: VW Group - Test Question  
([embedded image](#))

I scheduled both a 2bag and a 1bag US06. On my side of Verify, they are both shown as code 90 but one will change to 89 in the lab's system.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 04/27/2011 01:39 PM  
**Subject:** VW Group - Test Question

Hi Jim,  
Is the diesel US06 testing to be performed on this vehicle intended to be both (test type 90) one bag tests for particulate measurement, or did you mean one test to be a (test type 89) two bag?  
Thanks,  
Bill

**From:** Verify Administrator  
**Subject:** Vehicle selected for Test B3UG-TAQ, Supplemental Information needed  
**Date:** Fri 4/22/2011 1:52 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle:  
Manufacturer: ADX Vehicle ID: B3UG-TAQ Vehicle Configuration: 0 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 2 - CVS 75 and later (w/o can. load) 19 - Cert Diesel 7-15 ppm Sulfur 90 - US06 19 - Cert Diesel 7-15 ppm Sulfur 3 - HWFE 19 - Cert Diesel 7-15 ppm Sulfur

Vehicle ID: B3UG-TAQ  
Vehicle Configuration #: 0  
Test Group Name: CADXT03.03UG



**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 5/10/2011 8:17:35 PM  
**Subject:** Re: VW Group - Vehicle ID: C3UK-AMQ shift schedules updated  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
(embedded image)

I asked the lab to let me know if it looks okay on their side.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>, "Kissling, Karlheinz (N/EA-521)" <Karlheinz.Kissling@AUDI.DE>  
**Date:** 05/10/2011 07:43 AM  
**Subject:** VW Group - Vehicle ID: C3UK-AMQ shift schedules updated

Hello Jim,  
We have updated the Supplemental Information for the follow vehicle to include all new manual transmission shift schedules. This vehicle is schedule for confirmatory testing no May 25th. Please be sure your lab receives this new information prior to testing.

**From:** Verify Administrator  
**Subject:** Supplemental Information received  
**Date:** Tue 5/10/2011 7:31 AM

Your recent Supplemental Information submission has been received by the EPA and you will be notified if any additional actions on your part are required. A Submission Processing Report and any requested dataset reports can be found on the status history page. The status history page can be reached by clicking on the link near the bottom of this Inbox message.

The following is a summary of the processing report:

Total Datasets Submitted: 1

Accepted Datasets: 1  
Rejected Datasets: 0

Vehicle ID: C3UK-AMQ  
Vehicle Configuration #: 0

Thanks,  
Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
william.rodgers@vw.com

/ \_ \.  
(o\\_l\_/o)

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 5/20/2011 3:14:31 PM  
**Subject:** Re: VW Group - VID 411\_10206\_\_12 Release

Because the correlation between manufacturer's data and our initial test was so close, I don't want to use lab resources retesting the vehicle to get validated NOx results. We will use manufacturer's data as official results.

I released VID 411\_10206\_\_12. I noticed its already parked in the lot out front ready for pickup.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>, "Rhodes, Brian" <Brian.Rhodes@vw.com>  
Date: 05/20/2011 08:01 AM  
Subject: VW Group - VID 411\_10206\_\_12 Release

Hello Jim,

Can you please release the Passat 3.6L VID 411\_10206\_12 so we can pick it up on Monday morning.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com <mailto:william.rodgers@vw.com>

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(o\ \_ /o)

[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message\_body.rtf" deleted by Jim Snyder/AA/USEPA/US]



**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 5/23/2011 1:56:04 PM  
**Subject:** Re: VW Group - VID C3UG-TAQ Confirmatory prep

Thanks for the heads up. Latest word from the lab is that they can test Diesels starting Thursday so prep would be Wednesday. I don't yet have confirmation that they are planning to run both diesels that day.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 05/23/2011 09:32 AM  
Subject: VW Group - VID C3UG-TAQ Confirmatory prep

Hello Jim,

Our factory engineers have requested to be present when your lab starts the prep cycle for the above Audi Q7 diesel confirmatory vehicle. The engineers who will be present are: Mr. Karlheinz Kissling, Mr. Michael Schuetze and Mr. Sandro Olt.

Please let me know the time/day they should be available in the manufacturers room, Or if this request cannot be fulfilled.

Thanks,

Bill Rodgers

Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI

United States

(248) 754-4219

(248) 754-4207

william.rodgers@vw.com <mailto:william.rodgers@vw.com>

/ \_ \.  
(o\ \_ /o)

[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message\_body.rtf" deleted by Jim Snyder/AA/USEPA/US]


**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/26/2011 3:10:19 PM  
**Subject:** 2012 Audi TTRS 1st confirmatory test results  
[2012 Audi TTRS 1st confirmatory test results.pdf](#)

Hi Bill, The FTP city is failing NMOG and will be retested.

The US06 and Highway are more than 3% low on FE so let me know if VW accepts the data or requests a retest.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

MFR

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0170-018		Vehicle ID: C3UK-AMQ					
	Test Date: 5/25/2011		MFR Name: AUDI				
	Key Start / Hot Soak: 07:38:20 / 09:47		MFR Codes: 640      ADX				
	Fuel Container ID: F00023		Config #: 00				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: MANUAL				
	Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa		Shift Schedule: A06400022				
	Calculation Method: Gasoline		Beginning Odometer: 004308.0 MI				
Pretest Remarks:		Drive Schedule: flp3bag					
		Soak Period: 19.1 hours					
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	38.419	62.857	1.429	1.010	3.753		
Ambient	5.631	0.522	0.019	0.045	2.083		
Net Concentration	33.217	62.375	1.412	0.969	1.829	31.229	
Remarks:							
<b>Phase 2</b>							
Sample	7.463	0.927	0.159	0.722	1.969		
Ambient	5.873	0.095	0.017	0.045	2.075		
Net Concentration	1.906	0.838	0.143	0.679	0.006	1.899	
Remarks:							
<b>Phase 3</b>							
Sample	6.508	9.335	0.188	0.935	2.171		
Ambient	5.795	0.087	0.016	0.044	2.077		
Net Concentration	1.119	9.254	0.173	0.894	0.240	0.858	
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks: This test has particulate results.							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.428	1.623	0.055	396.0	0.027	0.402 / 0.419	22.321
Phase 2	0.039	0.035	0.009	442.6	0.000	0.039 / 0.041	20.159
Phase 3	0.014	0.239	0.007	362.6	0.004	0.011 / 0.011	24.585
Weighted	0.11292	0.42019	0.01782	410.887	0.00671	(NMOG=1.04xNMHC) 0.1066 / 0.1109	
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	22.27	Dyno #: D329 - FWD					
Phase 2	20.11	Inertia: 3750					
Phase 3	24.53	EPA Set Co A: 12.52					
		EPA Set Co B: 0.0882					
		EPA Set Co C: 0.02124					
Weighted	21.61	Emiss-Bench: Mexa 7200dle					
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# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0170-018

Vehicle ID: C3UK-AMQ

Results	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	1.535	5.821	0.197	1420.3	0.098	1.443	1.087
Phase 2	0.151	0.134	0.034	1705.3	0.001	0.150	
Phase 3	0.052	0.861	0.024	1306.2	0.013	0.040	



### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.96	28.96	28.96	
Avg Cell Temp (degF)	74.74	74.59	76.03	
Dew Point (degF)	49.86	49.46	49.20	
Specific Humidity (grains/lbm)	55.05	54.22	53.69	
NOx Corr Factor	0.9143	0.9110	0.9090	
CO2 Dilution Factor	13.136	18.542	14.309	
CFV Vmix (scf @68F)	2808.24	4805.59	2799.06	
Total Vmix (scf@68F)	2830.55	4843.86	2821.33	
CVS Flow Rate Avg (scfm)	332.53	331.23	331.51	

Fan Placement: One Fan - Down - Front

Phase Time (secs)	506.70	870.50	506.61
Distance (miles)	3.587	3.853	3.602
Bag Analysis Time (secs)	1004.2	247.1	140.7

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0307	0.48	0.01	391	0	0.0258

Odometer	MPG	PM
4157 M	22.7	0.004

MPG is 5.03 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7  
Fuel: 61 Tier 2 Cert Gasoline

mfr  
CVS

# NVFEL Laboratory Test Data

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0170-017

Vehicle ID: C3UK-AMQ

### Test Information



Test Date: 5/25/2011

MFR Name: AUDI

Key Start: 09:05:32

MFR Codes: 640

ADX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: MANUAL

Test Procedure: 03 HWFET (hwfetprep\_hwfet)

Shift Schedule: A06400023

Calculation Method: Gasoline

Beginning Odometer: 004320.0 MI

Pretest Remarks:

Drive Schedule: hwfet\_hwfet

### Bag Data

#### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	8.472	46.413	0.167	1.256	2.785	
Ambient	4.391	0.558	0.017	0.045	2.094	
Net Concentration	4.495	45.907	0.151	1.215	0.887	3.530

Remarks:

#### Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

#### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

#### Phase 4

Sample  
Ambient  
Net Concentration

Remarks: This test has particulate results.

### Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.030	0.622	0.003	258.5	0.007	0.024 / 0.025	34.381

(NMOG=1.04xNMHC)

### Fuel Economy

#### Gasoline MPG

Phase 1 34.30

#### Dyno Settings

Dyno #: D329 - FWD


Inertia: 3750


EPA Set Co A: 12.52

EPA Set Co B: 0.0882

EPA Set Co C: 0.02124

Emiss-Bench: Mexa 7200die

NVFEL Laboratory Test Data							CVS	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2011-0170-017				Vehicle ID: C3UK-AMQ				
	<b>Results</b>	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
	Phase 1	0.309	6.367	0.031	2647.9	0.071	0.243	1.087
<b>Test Conditions</b>		<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
		Barometer (inHg)	28.99					
		Avg Cell Temp (degF)	74.49					
		Dew Point (degF)	49.46					
		Specific Humidity (grains/lbm)	54.17					
		NOx Corr Factor	0.9108					
		CO2 Dilution Factor	10.623					
		CFV Vmix (scf @68F)	4173.46					
		Total Vmix (scf@68F)	4206.86					
		CVS Flow Rate Avg (scfm)	327.29					
Fan Placement: One Fan - Down - Front								
		Phase Time (secs)	765.10					
		Distance (miles)	10.242					
		Bag Analysis Time (secs)	125.2					
<b>MFR Test Results</b>		for Procedure 3 HWFE						
<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>		
1E+07	0.029	0.56	0.005	245	0	0.0239		
<u>Odometer</u>	<u>MPG</u>	PM						
4168 M	36.1	0.004						
MPG is 5.24 % higher than EPA MPG								
			MFR Lab: Audi AG Neckarsulm					
			Dyno: 7					
			Fuel: 61 Tier 2 Cert Gasoline					
<div style="display: flex; justify-content: space-between; font-size: small;"> <span>v101208 - d329    EPAVDAEm110525083509</span> <span>Page 2 of 2</span> <span>Print Time 25-May-2011 14:31</span> </div>								

NVFEL Laboratory Test Data						PARTICULATE	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0170-017				Vehicle ID: C3UK-AMQ			
		Test Date: 5/25/2011		MFR Name: AUDI			
		Key Start: 09:05:32		MFR Codes: 640		ADX	
		Fuel Container ID: F00023		Config #: 00			
		Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: MANUAL			
		Test Procedure: 03 HWFET (hwfetprep_hwfet)		Shift Schedule: A06400023			
		Calculation Method: Gasoline		Beginning Odometer: 004320.0 MI			
Pretest Remarks:				Drive Schedule: hwfet_hwfet			
All filter weights are corrected for buoyancy.							
<u>Particulate</u>	<u>Filter</u>	<u>Filter</u>	<u>Tare</u>	<u>Gross</u>	<u>Net Wt</u>	<u>Total Mass</u>	<u>Total Mass</u>
	Sampler	No.	(Pre Wt)	(Post Wt)	mg	mg	mg / mi
<u>Phase 1</u>	A	184266	135.4764	135.5867	0.11034	41.621	4.064
	B	184267	135.9122	136.0160	0.10383	39.258	3.833
	C	184268	136.0048	136.1053	0.10053	38.052	3.715
Remarks:							
<u>Phase 2</u>							
Remarks:							
<u>Phase 3</u>							
Remarks:							
<u>Phase 4</u>							
Remarks: <u>This test has particulate results.</u>							
<u>Average Results</u>					<u>Net Wt</u>	<u>Total Mass</u>	<u>Total Mass</u>
					mg	mg	mg / mi
Phase 1					0.10490	39.644	3.871
All filter weights are corrected for buoyancy.							
<u>Reference Filter Stability Check</u>							
2% of Avg Net or 0.01 mg		No.	<u>Tare</u>	<u>Gross</u>	<u>Net Wt</u>	<u>Stability Check</u>	Dyno #: D329 - FWD
0.01			(Pre Wt)	(Post Wt)	mg	PASS/FAIL	Inertia: 3750
		1	140.44739	140.44841	0.00102	PASS	EPA Set Co A: 12.52
		2	138.47901	138.47903	0.00002	PASS	EPA Set Co B: 0.0882
							EPA Set Co C: 0.02124
Emissions Bench Mexa 7200dle							
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**NVFEL Laboratory Test Data****PARTICULATE**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0170-017

Vehicle ID: C3UK-AMQ

WEIGHING CHAMBER		Buoyancy	Operator	Chamber Temp	Dew Point	Barometer	Last Change In Status
	Timestamp	Factor	(Id)	(°F)	(°F)	("Hg)	Status @ timestamp
Pre-test	5/24/11 10:34	1.0011098	021798	70.2	48.9	28.88	NORM @ 05/23/11 11:19:31
Post-test	5/25/11 12:29	1.0011092	021798	70.4	49.1	28.88	NORM @ 05/24/11 13:59:53

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.99			
Avg Cell Temp (degF)	74.49			
Dew Point (degF)	49.46			
Specific Humidity (grains/lbm)	54.17			
NOx Corr Factor	0.9108			
Dilution Factor	10.62			
CFV Vmix (scf @68F)	4173.46			
Sample Volume A (scf @68F)	11.153			
Sample Volume B (scf @68F)	11.127			
Sample Volume C (scf @68F)	11.114			
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	11.131			
Total Vmix (scf @68F)	4206.86			
Phase Time (sec)	765.10			
Distance (miles)	10.242			
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	41.5			
PSU Dil Air B (degC)	44.0			
PSU Dil Air C (degC)	40.3			
PSU Filter A (degC)	45.3			
PSU Filter B (degC)	48.2			
PSU Filter C (degC)	45.6			
PSU Dil Flow A (lpm)	29.7			
PSU Dil Flow B (lpm)	29.7			
PSU Dil Flow C (lpm)	29.7			
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0170-019

Vehicle ID: C3UK-AMQ

### Test Information

Test Date: 5/25/2011

MFR Name AUDI

Key Start: 10:04:31

MFR Codes: 640

ADX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: MANUAL

Test Procedure: 90 US06 (us06warmup\_us06)

Shift Schedule: A06400024

Calculation Method: Gasoline

Beginning Odometer: 004341.0 MI

Pretest Remarks:

Drive Schedule: us06\_us06



### Bag Data

#### Phase 1

Sample  
Ambient  
Net Concentration

HC-FID

(ppmC)

5.882

3.173

2.960

CO

(ppm)

50.825

0.709

50.172

NOx

(ppm)

1.340

0.021

1.320

CO2

(%)

1.055

0.044

1.014

CH4

(ppm)

2.435

1.985

0.607

NonMeth HC

(ppmC)

2.301

Remarks:

#### Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

#### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

#### Phase 4

Sample  
Ambient  
Net Concentration

Remarks: This test has particulate results.

### Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.034	1.162	0.046	369.2	0.008	0.026 / 0.027	24.049

(NMOG=1.04xNMHC)


### Fuel Economy


Gasoline MPG  
Phase 1 23.99

### Dyno Settings

Dyno #: D329 - FWD  
Inertia: 3750  
EPA Set Co A: 12.52  
EPA Set Co B: 0.0882  
EPA Set Co C: 0.02124

Emiss-Bench: Mexa 7200dle

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0170-019				Vehicle ID: C3UK-AMQ			
<b>Results</b>	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
 Phase 1	0.272	9.292	0.368	2952.3	0.064	0.211	1.087
<b>Test Conditions</b>							
	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
Barometer (inHg)	28.94						
Avg Cell Temp (degF)	74.91						
Dew Point (degF)	49.95						
Specific Humidity (grains/lbm)	55.28						
NOx Corr Factor	0.9152						
CO2 Dilution Factor	12.638						
CFV Vmix (scf @68F)	5591.34						
Total Vmix (scf@68F)	5617.51						
CVS Flow Rate Avg (scfm)	557.83						
Fan Placement: USO6 Only - One Large Fan - Down - Front							
Phase Time (secs)	601.40						
Distance (miles)	7.996						
Bag Analysis Time (secs)	135.3						
<b>MFR Test Results</b> for Procedure 90 US06							
<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
1E+07	0.0275	0.97	0.058	349	0	0.0218	
<u>Odometer</u>	<u>MPG</u>	PM		MFR Lab: Audi AG Neckarsulm			
4189 M	25.3	0.004		Dyno: 7			
	MPG is 5.45 % higher than EPA MPG			Fuel: 61 Tier 2 Cert Gasoline			
<div style="display: flex; justify-content: space-between; font-size: small;"> <span>v101208 - d329 EPAVDAEm110525093718</span> <span>Page 2 of 2</span> <span>Print Time 25-May-2011 14:33</span> </div>							

NVFEL Laboratory Test Data						PARTICULATE		
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Information		Test Number: 2011-0170-019			Vehicle ID: C3UK-AMQ			
	Test Date: 5/25/2011		MFR Name: AUDI					
	Key Start: 10:04:31		MFR Codes: 640			ADX		
	Fuel Container ID: F00023		Config #: 00					
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: MANUAL					
	Test Procedure: 90 US06 (us06warmup_us06)		Shift Schedule: A06400024					
	Calculation Method: Gasoline		Beginning Odometer: 004341.0 MI					
Pretest Remarks:		Drive Schedule: us06_us06						
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / ml	Filter comment
<b>Phase 1</b>	A	184269	139.2693	139.3256	0.05633	36.304	4.540	
	B	184270	136.4760	136.5253	0.04933	31.784	3.975	
	C	184271	137.2471	137.3004	0.05323	34.230	4.281	
Remarks:								
<b>Phase 2</b>								
Remarks:								
<b>Phase 3</b>								
Remarks:								
<b>Phase 4</b>								
Remarks: <u>This test has particulate results.</u>								
Average Results					Net Wt mg	Total Mass mg	Total Mass mg / ml	
Phase 1					0.05297	34.106	4.265	
All filter weights are corrected for buoyancy.								
Reference Filter Stability Check			Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Stability Check	Dyno #: D329 - FWD	
2% of Avg Net or 0.01 mg	No.					PASS/FAIL	Inertia: 3750	
0.01	1	140.44639	140.44816	0.00177	PASS	EPA Set Co A: 12.52		
	2	138.47871	138.47898	0.00027	PASS	EPA Set Co B: 0.0882		
							EPA Set Co C: 0.02124	
Emissions Bench Mexa 7200dle								
v101208 - d329 EPAVDAEm110525093718				Page 1 of 2		Print Time 25-May-2011 14:33		

**NVFEL Laboratory Test Data****PARTICULATE****Final Laboratory Test Results- Refer to VERIFY Reports for Official Data**

Test Number: 2011-0170-019

Vehicle ID: C3UK-AMQ

<u>WEIGHING CHAMBER</u>		<u>Buoyancy</u>	<u>Operator</u>	<u>Chamber Temp</u>	<u>Dew Point</u>	<u>Barometer</u>	<u>Last Change in Status</u>
	Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
<u>Pre-test</u>	5/24/11 10:44	1.0011098	021798	70.2	48.9	28.88	NORM @ 05/23/11 11:19:31
<u>Post-test</u>	5/25/11 12:43	1.0011081	021798	70.8	49.4	28.88	NORM @ 05/24/11 13:59:53

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.94			
Avg Cell Temp (degF)	74.91			
Dew Point (degF)	49.95			
Specific Humidity (grains/lbm)	55.28			
NOx Corr Factor	0.9152			
Dilution Factor	12.64			
CFV Vmix (scf @68F)	5591.34			
Sample Volume A (scf @68F)	8.717			
Sample Volume B (scf @68F)	8.718			
Sample Volume C (scf @68F)	8.736			
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	8.724			
Total Vmix (scf @68F)	5617.51			
Phase Time (sec)	601.40			
Distance (miles)	7.996			
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	41.8			
PSU Dil Air B (degC)	44.5			
PSU Dil Air C (degC)	41.0			
PSU Filter A (degC)	45.5			
PSU Filter B (degC)	47.5			
PSU Filter C (degC)	44.4			
PSU Dil Flow A (lpm)	29.6			
PSU Dil Flow B (lpm)	29.6			
PSU Dil Flow C (lpm)	29.6			
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

mfr  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0170-020

Vehicle ID: C3UK-AMQ

## Test Information

Test Date: 5/25/2011

MFR Name: AUDI

Key Start: 10:51:09

MFR Codes: 640

ADX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: MANUAL

Test Procedure: 89 us062bag (us06warmup\_2bagus06)

Shift Schedule: A06400024

Calculation Method: Gasoline

Beginning Odometer: 004356.0 MI

Pretest Remarks:

Drive Schedule: us06warmup\_2bagus06



## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	6.527	31.425	0.880	0.851	2.240	
Ambient	5.267	0.609	0.018	0.044	2.030	
Net Concentration	1.596	30.855	0.864	0.810	0.339	1.228

Remarks:

### Phase 2

Sample	7.733	69.682	1.957	1.188	2.447	
Ambient	5.239	0.654	0.019	0.044	2.038	
Net Concentration	2.961	69.087	1.940	1.147	0.591	2.319

Remarks:

### Phase 3

Sample	
Ambient	
Net Concentration	

Remarks:

### Phase 4

Sample	
Ambient	
Net Concentration	

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.032	1.266	0.053	522.6	0.008	0.025 / 0.026	17.012
Phase 2	0.026	1.236	0.052	322.5	0.006	0.021 / 0.021	27.503

Composite 0.02761 1.24271 0.05241 366.803 0.00648 (NMOG=1.04xNMHC) 0.0215 / 0.0224

## Fuel Economy

### Gasoline MPG

Phase 1	16.97						
Phase 2	27.44						
Composite	24.13						

### Dyno Settings

Dyno #: D329 - FWD


Inertia: 3750

EPA Set Co A: 12.52

EPA Set Co B: 0.0882

EPA Set Co C: 0.02124

Emiss-Bench: Mexa 7200dle

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0170-020				Vehicle ID: C3UK-AMQ			
<b>Results</b> 	<b>HC-FID</b> (grams)	<b>CO</b> (grams)	<b>NOx</b> (grams)	<b>CO2</b> (grams)	<b>CH4</b> (grams)	<b>NMHC</b> (grams)	<b>Meth Response</b> 1.087
Phase 1	0.057	2.243	0.094	925.4	0.014	0.044	
Phase 2	0.163	7.696	0.325	2008.1	0.038	0.128	
<b>Test Conditions</b>							
	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
Barometer (inHg)	28.93	28.93					
Avg Cell Temp (degF)	74.40	74.52					
Dew Point (degF)	49.80	49.97					
Specific Humidity (grains/lbm)	55.00	55.35					
NOx Corr Factor	0.9141	0.9154					
CO2 Dilution Factor	15.668	11.211					
CFV Vmix (scf @68F)	2204.65	3378.68					
 CVS Flow Rate Avg (scfm)	 558.85	 555.40					
Fan Placement: US06 Only - One Large Fan - Down - Front							
Phase Time (secs)	130.00	365.00	106.69				
Distance (miles)	1.771	6.227					
Bag Analysis Time (secs)	129.8	351.4					
 <b>MFR Test Results</b> for Procedure 90 US06							
<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
1E+07	0.0275	0.97	0.058	349	0	0.0218	
<u>Odometer</u>	<u>MPG</u>	PM		MFR Lab: Audi AG Neckarsulm			
4189 M	25.3	0.004		Dyno: 7			
	MPG is 4.85 % higher than EPA MPG			Fuel: 61 Tier 2 Cert Gasoline			

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 5/31/2011 1:53:46 PM  
**Subject:** Fw: 411 10208-12\_5-26-11 Laboratory Test Data  
[411 10208-12\\_5-26-11.pdf](#)

Here's the Diesel Passat data. The FTP data was voided due to CH4 span check and will have to be rerun.  
Let me if VW accepts the US06 and Hwy.


I haven't seen any of the recent tests in Verify yet but hopefully we will later this morning.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 05/31/2011 09:46 AM -----

**From:** Vincent Mazaitis/AA/USEPA/US  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 05/31/2011 08:16 AM  
**Subject:** 411 10208-12\_5-26-11 Laboratory Test Data



C150

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
		Test Number: 2011-0128-006		Vehicle ID: 411 10208 /12			
		Test Date: 5/26/2011		MFR Name: VOLKSWAGEN			
		Key Start: 09:03:59		MFR Codes: 590 VWX			
		Fuel Container ID: F00022		Config #: 00			
		Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur		Transmission: S			
		Test Procedure: 03 HWFET (hwfetprep_hwfet)		Shift Schedule: A09980011			
Calculation Method: Diesel		Beginning Odometer: 003847.0 MI					
Pretest Remarks:		Drive Schedule: hwfet_hwfet					
<b>Bag Data</b>							
		<u>THC / IntTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
<b>Phase 1</b>	Sample	6.721 / 6.706	0.541	0.031	0.886	2.133	
	Ambient	6.822	0.083	0.009	0.045	2.001	
	Net Concentration	0.350 / 0.336	0.464	0.023	0.844	0.265	0.048
		Remarks:					
<b>Phase 2</b>							
	Sample						
	Ambient						
	Net Concentration						
		Remarks:					
<b>Phase 3</b>							
	Sample						
	Ambient						
	Net Concentration						
		Remarks:					
<b>Phase 4</b>							
	Sample						
	Ambient						
	Net Concentration						
		Remarks: This test has particulate results.					
<b>Results</b>							
		<u>THC / IntTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		- / 0.002	0.006	0.000	178.7	0.002	0.000
		Vol MPG					
		(mpg)					
		57.649					
		(NMOG=NMHC)					
<b>Fuel Economy</b>							
		<u>Diesel MPG</u>	<u>Dyno Settings</u>		<u>Dyno #:</u>		
Phase 1		56.93			D329 - FWD		
					Inertia: 3750		
					EPA Set Co A: 11.76		
					EPA Set Co B: 0.1557		
					EPA Set Co C: 0.01604		
					Emiss-Bench: Mexa 7200dle		
v101208 - d329 EPAVDAEm110526083728 Page 1 of 2 Print Time 26-May-2011 16:14							

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0128-006

Vehicle ID: 411 10208 /12

### Results



	<u>THC / IntTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	- / 0.023	0.064	0.005	1829.1	0.021	0.003	1.087

### Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.72			
Avg Cell Temp (degF)	74.74			
Dew Point (degF)	50.89			
Specific Humidity (grains/lbm)	57.71			
NOx Corr Factor	0.9248			
CO2 Dilution Factor	15.117			
CFV Vmix (scf @68F)	4149.10			
Total Vmix (scf@68F)	4182.66			
CVS Flow Rate Avg (scfm)	325.38			


Fan Placement: One Fan - Up - Front

Phase Time (secs)	765.10
Distance (miles)	10.234
Bag Analysis Time (secs)	125.2

### MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0009	0.01	0.005	170	0	0
<u>Odometer</u>	<u>MPG</u>	<u>PM</u>				
3744 M	59.9	0.004				
MPG is 5.22 % higher than EPA MPG						
MFR Lab: Volkswagen AG, Dept EASZ/1						
Dyno: 21						
Fuel: 19 Cert Diesel 7-15 ppm Sulfur						

NVFEL Laboratory Test Data						PARTICULATE		
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Information				Vehicle ID: 411 10208 /12				
	Test Date: 5/26/2011			MFR Name: VOLKSWAGEN				
	Key Start: 09:03:59			MFR Codes: 590 VWX				
	Fuel Container ID: F00022			Config #: 00				
	Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur			Transmission: S				
	Test Procedure: 03 HWFET (hwfetprep_hwfet)			Shift Schedule: A09980011				
	Calculation Method: Diesel			Beginning Odometer: 003847.0 MI				
Pretest Remarks:				Drive Schedule: hwfet_hwfet				
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / mi	Filter comment
<u>Phase 1</u>	A	184313	138.9996	139.0025	0.00289	1.080	0.106	
	B	184314	138.2673	138.2742	0.00690	2.578	0.252	
	C	184315	135.9861	135.9953	0.00921	3.450	0.337	
Remarks:								
<u>Phase 2</u>								
Remarks:								
<u>Phase 3</u>								
Remarks:								
<u>Phase 4</u>								
Remarks: <u>This test has particulate results.</u>								
Average Results					Net Wt	Total Mass	Total Mass	
					mg	mg	mg / mi	
Phase 1					0.00633	2.370	0.232	
All filter weights are corrected for buoyancy.								
Reference Filter Stability Check				Tare	Gross	Net Wt	Stability Check	Dyno #: D329 - FWD
2% of Avg Net or 0.01 mg		No.	(Pre Wt)	(Post Wt)	mg	PASS/FAIL	Inertia: 3750	
0.01	1	140.45454	140.44993	-0.00462	PASS	EPA Set Co A: 11.76		
	2	138.48357	138.48005	-0.00351	PASS	EPA Set Co B: 0.1557		
						EPA Set Co C: 0.01604		
Emissions Bench Mexa 7200dle								
v101208 - d329 EPAVDAEm110526083728				Page 1 of 2		Print Time 26-May-2011 16:14		

**NVFEL Laboratory Test Data****PARTICULATE****Final Laboratory Test Results- Refer to VERIFY Reports for Official Data**


Test Number: 2011-0128-006


Vehicle ID: 411 10208 /12

<b>WEIGHING CHAMBER</b>	<b>Buoyancy</b>	<b>Operator</b>	<b>Chamber Temp</b>	<b>Dew Point</b>	<b>Barometer</b>	<b>Last Change in Status</b>
Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
<b>Pre-test</b> 5/25/11 15:10	1.0011065	021798	71.1	49.4	28.85	NORM @ 05/24/11 13:59:53
<b>Post-test</b> 5/26/11 10:46	1.0011036	021798	70.3	49.1	28.73	NORM @ 05/26/11 08:15:32

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.72			
Avg Cell Temp (degF)	74.74			
Dew Point (degF)	50.89			
Specific Humidity (grains/lbm)	57.71			
NOx Corr Factor	0.9248			
Dilution Factor	15.12			
CFV Vmix (scf @68F)	4149.10			
Sample Volume A (scf @68F)	11.204			
Sample Volume B (scf @68F)	11.195			
Sample Volume C (scf @68F)	11.164			
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	11.188			
Total Vmix (scf @68F)	4182.66			
Phase Time (sec)	765.10			
Distance (miles)	10.234			
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	41.9			
PSU Dil Air B (degC)	44.5			
PSU Dil Air C (degC)	41.1			
PSU Filter A (degC)	45.4			
PSU Filter B (degC)	48.4			
PSU Filter C (degC)	46.2			
PSU Dil Flow A (lpm)	29.9			
PSU Dil Flow B (lpm)	29.9			
PSU Dil Flow C (lpm)	29.9			
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0128-007		Vehicle ID: 411 10208 /12					
Test Date: 5/26/2011		MFR Name VOLKSWAGEN					
Key Start: 10:47:09		MFR Codes: 590 VWX					
Fuel Container ID: F00022		Config #: 00					
Fuel Type: 19 Cert Diesel 7-15 ppm Sulfur		Transmission: S					
Test Procedure: 89 us062bag (us06warmup_2bagus06)		Shift Schedule: A09980041					
Calculation Method: Diesel		Beginning Odometer: 003884.0 MI					
Pretest Remarks:		Drive Schedule: us06warmup_2bagus06					
<b>Test Information</b>							
							
<b>Bag Data</b>							
	<u>THC / IntTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	7.831 / 7.829	0.463	0.169	0.681	2.127		
Ambient	7.907	0.077	0.020	0.043	2.215		
Net Concentration	0.326 / 0.325	0.390	0.150	0.640	0.025	0.297	
Remarks:							
<b>Phase 2</b>							
Sample	7.731 / 7.688	0.511	0.099	0.880	2.160		
Ambient	7.836	0.072	0.019	0.044	2.218		
Net Concentration	0.410 / 0.367	0.443	0.081	0.840	0.088	0.272	
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
	<u>THC / IntTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	- / 0.007	0.016	0.009	412.5	0.001	0.006	24.978
Phase 2	- / 0.003	0.008	0.002	235.6	0.001	0.002	43.728
Composite	0.00399	0.00970	0.00383	274.694	0.00083	0.00321	
						(NMOG=NMHC)	
<b>Fuel Economy</b>							
	<u>Diesel MPG</u>	<u>Dyno Settings</u>					
Phase 1	24.67	Dyno #: D329 - FWD					
Phase 2	43.18	Inertia: 3750					
		EPA Set Co A: 11.76					
		EPA Set Co B: 0.1557					
		EPA Set Co C: 0.01604					
Composite	37.00	Emiss-Bench: Mexa 7200dle					
v101208 - d329 EPAVDAEm110526102108 Page 1 of 2 Print Time 26-May-2011 11:28							

NVFEL Laboratory Test Data							CVS	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2011-0128-007				Vehicle ID: 411 10208 /12				
	<b>Results</b>	<u>THC / InTHC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
		(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
	Phase 1	- / 0.012	0.028	0.017	729.1	0.001	0.011	1.087
	Phase 2	- / 0.020	0.049	0.014	1469.0	0.006	0.015	
<b>Test Conditions</b>								
		<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
	Barometer (inHg)	28.73	28.73					
	Avg Cell Temp (degF)	74.67	74.93					
	Dew Point (degF)	52.25	52.20					
	Specific Humidity (grains/lbm)	60.71	60.59					
	NOx Corr Factor	0.9371	0.9366					
	CO2 Dilution Factor	19.653	15.209					
	CFV Vmix (scf @68F)	2199.77	3377.44					
	 CVS Flow Rate Avg (scfm)	 557.37	 555.20					
	Fan Placement: USO6 Only - One Large Fan - Down - Front							
	Phase Time (secs)	130.01	364.99	106.80				
	Distance (miles)	1.768	6.235					
	Bag Analysis Time (secs)	130.2	351.9					
 <b>MFR Test Results</b> for Procedure 90 US06								
	<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
	1E+07	0.0018	0.01	0.004	257	0	0	
	<u>Odometer</u>	<u>MPG</u>	<u>PM</u>		MFR Lab: Volkswagen AG, Dept EASZ/1			
	3769 M	39.6	0.001		Dyno: 21			
		MPG is 7.03 % higher than EPA MPG			Fuel: 19 Cert Diesel 7-15 ppm Sulfur			

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** "Schuetze, Michael (N/EA-521)" [Michael.Schuetze@audi.de]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 5/31/2011 8:44:50 PM  
**Subject:** RE: Audi Q7 data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

That's good but I think we should wait until the data appears in Verify first. I heard they fixed a bug that was holding up transfers.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Schuetze, Michael (N/EA-521)" <Michael.Schuetze@audi.de>  
**Date:** 05/31/2011 03:30 PM  
**Subject:** RE: Audi Q7 data

Hello Jim,  
Audi has decided to accept the confirmatory test results for the Audi Q7 TDI, VID B3UG-TAQ. Please release the vehicle for pick up.

Regards,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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From: [Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov) [mailto:[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)]

Sent: Thursday, May 26, 2011 5:16 PM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: Audi Q7 data

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/1/2011 1:20:24 PM  
**Subject:** Fw: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Passat is scheduled for Tuesday. Sorry, they couldn't squeeze it in this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 06/01/2011 09:19 AM -----

From: VerifyAdministrator@verify-as1.epa.gov  
To: Jim Snyder/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA  
Date: 06/01/2011 09:15 AM  
Subject: Confirmatory Test Date assigned for (411 10208 /12 / 0)

PLEASE DO NOT REPLY TO THIS EMAIL!

A Confirmatory Test Date has been set for the following vehicle :

Test Date : 06/07/2011  
Manufacturer: VWX  
Vehicle ID: 411 10208 /12  
Vehicle Configuration: 0

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/1/2011 1:49:44 PM  
**Subject:** RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

I sent them a note about charging.

I think we'll see the Q7 data in Verify today.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/01/2011 09:27 AM  
Subject: RE: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Thanks for trying.  
Please remind the lab to put it on a battery charger once it comes inside as discussed.  
Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 01, 2011 9:20 AM  
To: Rodgers, William  
Subject: Fw: Confirmatory Test Date assigned for (411 10208 /12 / 0)

Passat is scheduled for Tuesday. Sorry, they couldn't squeeze it in this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 06/01/2011 09:19 AM -----

From: VerifyAdministrator@verify-as1.epa.gov  
To: Jim Snyder/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA  
Date: 06/01/2011 09:15 AM  
Subject: Confirmatory Test Date assigned for (411 10208 /12 / 0)

PLEASE DO NOT REPLY TO THIS EMAIL!

A Confirmatory Test Date has been set for the following vehicle :

Test Date : 06/07/2011  
Manufacturer: VWX  
Vehicle ID: 411 10208 /12  
Vehicle Configuration: 0

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/2/2011 2:35:25 PM  
**Subject:** RE: Audi Q7 data  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>

I talked to the lab and they were already aware of it. the last US06 should appear today.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 06/02/2011 09:25 AM  
**Subject:** RE: Audi Q7 data

Hi Jim,  
Three of the four Q7 test results came through in Verify last night. It appears that the (89) US06 2-bag is MIA. Can you check on it or should I call the help desk?  
Thanks, Bill

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Tuesday, May 31, 2011 4:45 PM  
**To:** Rodgers, William  
**Cc:** Schuetze, Michael (N/EA-521); Hart, Robert (VWoA); Mazaitis.Vincent@epamail.epa.gov  
**Subject:** RE: Audi Q7 data

That's good but I think we should wait until the data appears in Verify first. I heard they fixed a bug that was holding up transfers.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Schuetze, Michael (N/EA-521)" <Michael.Schuetze@audi.de>

Date: 05/31/2011 03:30 PM  
Subject: RE: Audi Q7 data

Hello Jim,  
Audi has decided to accept the confirmatory test results for the Audi Q7 TDI, VID B3UG-TAQ. Please release the vehicle for pick up.

Regards,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
william.rodgers@vw.com

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From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, May 26, 2011 5:16 PM  
To: Rodgers, William  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: Audi Q7 data

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/6/2011 9:00:20 PM  
**Subject:** cert req  
[Hotspot](#)

Bill, this the cert request that you need to re-submit per my phone message. CVWXT03.6U76

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/7/2011 2:00:30 PM  
**Subject:**

The Audi TTRS will run at 7 tomorrow morning.

There seems some confusion with fan position between the vehicle sheet and the representative. You might want to ask Carl Heinz what he wants on the TTRS. I don't remeber if it was an issue on it or just the Q7.

I have the start sheet, thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/7/2011 6:40:51 PM  
**Subject:** Re: FW: 2012 Lamborghini Label Index #65

I caught up with Bob , All test data will be re-loaded including EPA LOD data and even older data migrated from CEFIS. So the C/O data should appear. Give it another day.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA, Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 05/31/2011 06:39 AM  
Subject: FW: 2012 Lamborghini Label Index #65

Hello Jim;

As you can see from the mail below and the Verify help desk response, the EPA will have to repair the EPA confirmatory test to eliminate the bag 1 results from the test (#9ADX09010216). This new rule, that has affected most of our SC03 and Highway tests, does not permit a value to be entered in Bag 1. We had to fix several manufacture tests in order for the 2012 labels to be accepted into Verify. We are unable or permitted to change the data in an EPA test. Could you please investigate and let me know the outcome?

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

-----Original Message-----

From: Savannah Strong [mailto:sstrong@csc.com] On Behalf Of Verify Help



Desk  
Sent: Friday, May 27, 2011 3:34 PM  
To: Thomas, Richard (EEO)  
Subject: Re: 2012 Lamborghini Label Index #65

Richard,

The rule is new since last friday's deployment. You will have to refer a different test or discuss this with your EPA cert.

Savannah

Verify Help Desk  
Staffed by Computer Sciences Corporation, Contractor to the  
Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Thomas, Richard

(EEO)"

To <Richard.Thomas@v  
w.com> Verify Help Desk@CSC

cc 05/26/2011 07:46 <Good.David@epamail.epa.gov>,  
AM <snyder.jim@epa.gov>

Subject 2012 Lamborghini Label Index #65

Hello Vince;

The attached scan has the Verify error report for this Lamborghini Gallardo index #65. It was not accepted because the highway test has bag 1 values and they should not be there. We cannot change this data because it was an EPA confirmatory test. Who is responsible for correcting this old 2009 EPA test? I am sure there are a number of other EPA tests that must be corrected.

Thanks,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

(See attached file: 20110526073341135.pdf)

[attachment "winmail.dat" deleted by Jim Snyder/AA/USEPA/US] [attachment "message\_body.rtf" deleted by Jim Snyder/AA/USEPA/US] [attachment "20110526073341135.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/7/2011 10:20:53 PM  
**Subject:** Re: VW Group - CVWXT03.6U76 Certificate Request

It looked okay. I approved it. I will deny the others and you can re-submit them.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 06/07/2011 03:04 PM  
Subject: VW Group - CVWXT03.6U76 Certificate Request

Hello Jim,

Today we re-submitted the certificate request for test group CVWXT03.6U76. The original request was rejected. I believe this should be ok now, but please let me know if any other changes are required.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/8/2011 1:39:54 PM  
**Subject:** Re: VW Group - CVWXT03.6U76 Certificate Request

Okay, I finally remembered to delete the requests this morning. You can re-submit them and they should be fine.

The same problem that kept the STP composite calculated values from showing also effected the CSI data printouts in the Part One Application pdf files of the VW and 2 Audi applications that just denied. Those Part One pdf files will need to be revised with new CSI summaries printouts. I don't think you need to wait on re-submitting the Cert request over revising the pdf if you are running tight on the certificate timing.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Giles, Michael" <michael.giles@vw.com>  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
**Date:** 06/07/2011 06:20 PM  
**Subject:** Re: VW Group - CVWXT03.6U76 Certificate Request

It looked okay. I approved it. I will deny the others and you can re-submit them.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Giles, Michael" <michael.giles@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Rodgers, William" <William.Rodgers@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 06/07/2011 03:04 PM  
**Subject:** VW Group - CVWXT03.6U76 Certificate Request

Hello Jim,

Today we re-submitted the certificate request for test group CVWXT03.6U76. The original request was rejected. I believe this should be ok now, but please let me know if any other changes are required.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** [REDACTED]@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/9/2011 5:31:12 PM  
**Subject:** CREE questions

[REDACTED] I got your voice mail but my notes just aren't good enough. Could you list your questions in an email? I think its more than I can handle over the phone.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA;CN=Ben Haynes/OU=AA/O=USEPA/C=US@EPA[]; N=Ben Haynes/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/9/2011 8:37:09 PM  
**Subject:** Re: VW and Audi Vehicle releases  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Bill, I assume this means Audi accepts the FE values? I signed off on the two vehicles but I don't know where the keys are and who will be here to contact Friday. I think you are better off waiting to Monday when we are all here.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>  
Date: 06/09/2011 03:19 PM  
Subject: Vehicle releases

Hello Jim,  
Please release the VW Passat and Audi TTRS test vehicles. We hope to pick them up on Friday (tomorrow) and/or Monday.  
The Verify results came in today for the TTRS.

Thanks,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \  
(o\\_l\_/o)

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/9/2011 10:30:04 PM  
**Subject:** Audi cert request

Bill, Looking through the last cert request and its for the Audi TTRS that we just tested. Its not a conditional cert request either. What am I missing here?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/13/2011 12:59:43 PM  
**Subject:** Re: Vehicle pick up  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Ok. I informed Ben that you are coming today.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 06/13/2011 08:36 AM  
Subject: Vehicle pick up

Hi Jim,  
Just a reminder that we plan to pick up both the VW Passat TDI and Audi TTRS test vehicles today. Please make sure the keys are with Security.

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\\_o)

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/13/2011 1:20:56 PM  
**Subject:** Re: FW: Audi cert request  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

No. I think I just need to look at it again.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/13/2011 09:04 AM  
Subject: FW: Audi cert request

Jim,  
Did you need me to resubmit anything on this?

Bill

From: Rodgers, William  
Sent: Friday, June 10, 2011 7:59 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: RE: Audi cert request

Jim,  
The Audi TTRS (CADXV02.53UK, VID 3UK-AMQ) was one of those certificate requests denied. I resubmitted the Application with the new CSI.  
The Cert. Request was resubmitted as non-conditional because we had just completed and passed the confirmatory tests.

The application and CSI will be updated with the new confirmatory test results at the update time as originally planned. Let me know if you need that done now instead.

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207

william.rodgers@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, June 09, 2011 6:30 PM  
To: Rodgers, William  
Subject: Audi cert request

Bill, Looking through the last cert request and its for the Audi TTRS that we just tested. Its not a conditional cert request either. What am I missing here?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rhodes, Brian (EEO)" [Brian.Rhodes@vw.com]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 11/8/2012 2:04:10 PM  
**Subject:** Vehicle pick up - Audi A5

Hello Jim and Vince,

The plan is to pick up the Audi A5 Friday morning, probably around 9:00 am.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Rhodes, Brian (EEO)" [Brian.Rhodes@vw.com]; Rist, Domenic (I/EA-523)" [Domenic.Rist@audi.de]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Thur 11/8/2012 2:28:50 PM  
**Subject:** Re: Vehicle pick up - Audi A5

Hello Mike,

Following up the phone message I left, you're good to go on the A5. Just have your driver see Security. The vehicle will be in the West lot.

Thanks Mike,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>, "Rhodes, Brian (EEO)" <Brian.Rhodes@vw.com>, "Rist, Domenic (I/EA-523)" <Domenic.Rist@audi.de>, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
Date: 11/08/2012 09:05 AM  
Subject: Vehicle pick up - Audi A5

Hello Jim and Vince,

The plan is to pick up the Audi A5 Friday morning, probably around 9:00 am.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Thur 11/8/2012 5:36:37 PM  
**Subject:** Re: A8 results from Tuesday  
[D3UG-DAQ\\_11-6-12.pdf](#)

Hello Mike,

Sorry for the mix-up. Please find enclosed the Laboratory Test Data from the A8

If you have any questions or concerns, please contact me.

Thanks,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 11/08/2012 11:14 AM  
Subject: A8 results from Tuesday

Hi Vince,

We found a first day testing in our VERIFY inbox for the A8 TDI.

Could you also me the PDF files of the lab reports (with all the bag data)?

Thanks!

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 11/8/2012 5:38:20 PM  
**Subject:** RE: A8 results from Tuesday  
[michael.giles@vw.com](mailto:michael.giles@vw.com)

No problem, thanks!

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Thursday, November 08, 2012 12:36 PM  
To: Giles, Michael (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Wright.DavidA@epamail.epa.gov  
Subject: Re: A8 results from Tuesday

Hello Mike,

Sorry for the mix-up. Please find enclosed the Laboratory Test Data from the A8

If you have any questions or concerns, please contact me.

Thanks,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 11/08/2012 11:14 AM  
Subject: A8 results from Tuesday

Hi Vince,

We found a first day testing in our VERIFY inbox for the A8 TDI.

Could you also me the PDF files of the lab reports (with all the bag data)?

Thanks!

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Rodgers, William"  
[William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=DavidA  
Wright/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 11/9/2012 1:00:20 PM  
**Subject:** D3UG-DAQ  
[D3UG-DAQ 11-8-12 Start-Stop.pdf](#)

Good morning Mike and Bill,

Please find enclosed the Laboratory Test Data for the Subject vehicle. It is with the start/stop functional.

If you have any questions or concerns, please contact me.

Thanks guys, and have a great weekend!

Vince Mazaitis

**To:** Vincent Mazaitis/AA/USEPA/US@EPA;"Giles, Michael (EEO)" [michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 11/9/2012 1:49:11 PM  
**Subject:** RE: D3UG-DAQ

Thanks Vince. We will discuss with Germany and let you know if the car is to be released.

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, November 09, 2012 8:00 AM  
To: Giles, Michael (EEO); Rodgers, William (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Wright.DavidA@epamail.epa.gov  
Subject: D3UG-DAQ

Good morning Mike and Bill,

Please find enclosed the Laboratory Test Data for the Subject vehicle. It is with the start/stop functional.

If you have any questions or concerns, please contact me.

Thanks guys, and have a great weekend!

Vince Mazaitis

**To:** Vincent Mazaitis/AA/USEPA/US@EPA;"Giles, Michael (EEO)" [michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;DavidA Wright/AA/USEPA/US@EPA[]; avidA Wright/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 11/9/2012 2:52:19 PM  
**Subject:** RE: D3UG-DAQ  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[Mazaitis.Vincent@epamail.epa.gov](mailto:Mazaitis.Vincent@epamail.epa.gov)  
[mailto:Mazaitis.Vincent@epamail.epa.gov](mailto:mailto:Mazaitis.Vincent@epamail.epa.gov)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[Wright.DavidA@epamail.epa.gov](mailto:Wright.DavidA@epamail.epa.gov)

Vince,

As discussed, we will accept the confirmatory test data for VID D3UG-DAQ. Please release the vehicle for pick up today.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

From: Rodgers, William (EEO)  
Sent: Friday, November 09, 2012 8:49 AM  
To: 'Mazaitis.Vincent@epamail.epa.gov'; Giles, Michael (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Wright.DavidA@epamail.epa.gov  
Subject: RE: D3UG-DAQ

Thanks Vince. We will discuss with Germany and let you know if the car is to be released.

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, November 09, 2012 8:00 AM  
To: Giles, Michael (EEO); Rodgers, William (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Wright.DavidA@epamail.epa.gov  
Subject: D3UG-DAQ

Good morning Mike and Bill,

Please find enclosed the Laboratory Test Data for the Subject vehicle. It is with the start/stop functional.

If you have any questions or concerns, please contact me.

Thanks guys, and have a great weekend!

Vince Mazaitis

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Giles, Michael (EEO)" [michael.giles@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Giles, Michael (EEO)" [michael.giles@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US  
**Sent:** Fri 11/9/2012 3:15:20 PM  
**Subject:** RE: D3UG-DAQ  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[Mazaitis.Vincent@epamail.epa.gov](mailto:Mazaitis.Vincent@epamail.epa.gov)  
[mailto:Mazaitis.Vincent@epamail.epa.gov](mailto:mailto:Mazaitis.Vincent@epamail.epa.gov)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[Wright.DavidA@epamail.epa.gov](mailto:Wright.DavidA@epamail.epa.gov)

Thanks Bill!

The vehicle has been released and your driver can pick up the keys from Security as usual.

Vince Mazaitis

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA, "Giles, Michael (EEO)" <michael.giles@vw.com>  
Cc: Jim Snyder/AA/USEPA/US@EPA, DavidA Wright/AA/USEPA/US@EPA  
Date: 11/09/2012 09:52 AM  
Subject: RE: D3UG-DAQ

Vince,

As discussed, we will accept the confirmatory test data for VID D3UG-DAQ. Please release the vehicle for pick up today.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI



(248) 754-4219

william.rodgers@vw.com

From: Rodgers, William (EEO)  
Sent: Friday, November 09, 2012 8:49 AM  
To: 'Mazaitis.Vincent@epamail.epa.gov'; Giles, Michael (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Wright.DavidA@epamail.epa.gov  
Subject: RE: D3UG-DAQ

Thanks Vince. We will discuss with Germany and let you know if the car is to be released.

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, November 09, 2012 8:00 AM  
To: Giles, Michael (EEO); Rodgers, William (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Wright.DavidA@epamail.epa.gov  
Subject: D3UG-DAQ

Good morning Mike and Bill,

Please find enclosed the Laboratory Test Data for the Subject vehicle. It is with the start/stop functional.

If you have any questions or concerns, please contact me.

Thanks guys, and have a great weekend!

Vince Mazaitis

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 11/9/2012 6:34:12 PM  
**Subject:** Decision Information - 2013 Jetta Hybrid

Hello Jim,

We have submitted new fuel economy tests and the Decision Information Request to support a running change for the 2013 Jetta Hybrid, test group DVWXV01.4PHE. This running change introduces a new FEDV to the test group which will represent the fuel economy for all 2013 Jetta Hybrid models from the Start of Production. These new tests require Manufacturer Confirmatory testing of FTP and HWY cycles due to high fuel economy for the ETW and Class. Because of this and due to critical timing of our model launch plans, we are requesting that EPA waive confirmatory testing.

Please contact Mike Giles (248) 754-4227 or Richard Thomas (248) 754-4213 in our office on Monday morning if possible to discuss this request.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** "Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; Stendel, Detlef (EASZ/1)" [detlef.stendel@volkswagen.de]; Preuss, Richard (EASZ)" [Richard.Preuss@volkswagen.de]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; inc Wehrly/AA/USEPA/US@EPA; Jim Snyder/AA/USEPA/US@EPA[]; im Snyder/AA/USEPA/US@EPA[]  
**From:** "Schmidt, Oliver (EEO)"  
**Sent:** Fri 11/9/2012 7:12:23 PM  
**Subject:** Jetta Hybrid

Let us just use the Volkswagen system with the toll free call in number !  
.....

Join by Phone  
+1 (248) 754-6400  
+1 (855) 858-8080  
Find a local number<<https://dialin.vw.com>>

Conference ID: Ex. 6

Hello,

as agreed with Lync, Volkswagen would like to take the opportunity to give the EPA an overview on the improvements on the Fuel Economy that were achieved since the original testing 6 weeks ago.

Hello Jim, hello Lync,

could you please provide a call in number for our colleges from Wolfsburg ?

Thank you

Oliver Schmidt

General Manager  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4201  
Cell: (248) 760-6180  
FAX: (248) 754-4207  
E-Mail: [Oliver.Schmidt@vw.com](mailto:Oliver.Schmidt@vw.com)<<mailto:Oliver.Schmidt@vw.com>>

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Schmidt, Oliver (EEO)" [Oliver.Schmidt@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 11/12/2012 2:33:07 PM  
**Subject:** RE: Decision Information - 2013 Jetta Hybrid

Hello Jim,

I have just been informed that a meeting is proposed between EPA and Volkswagen representatives to discuss this running change on Tuesday afternoon, Nov. 13th. I would ask that you wait to make your confirmatory test decision until the time of this meeting so all questions can be addressed.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

From: Rodgers, William (EEO)  
Sent: Friday, November 09, 2012 1:34 PM  
To: Snyder, Jim  
Cc: Giles, Michael; Schlueter, Hannah (EASZ/1); Thomas, Richard (EEO); Kata, Leonard (EEO)  
Subject: Decision Information - 2013 Jetta Hybrid

Hello Jim,

We have submitted new fuel economy tests and the Decision Information Request to support a running change for the 2013 Jetta Hybrid, test group DVW XV01.4PHE. This running change introduces a new FEDV to the test group which will represent the fuel economy for all 2013 Jetta Hybrid models from the Start of Production. These new tests require Manufacturer Confirmatory testing of FTP and HWY cycles due to high fuel economy for the ETW and Class. Because of this and due to critical timing of our model launch plans, we are requesting that EPA waive confirmatory testing.

Please contact Mike Giles (248) 754-4227 or Richard Thomas (248) 754-4213 in our office on Monday morning if possible to discuss this request.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** "Schmidt, Oliver (EEO)"  
**Sent:** Mon 11/12/2012 2:35:33 PM  
**Subject:** RE: Decision Information - 2013 Jetta Hybrid  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Correct,

that is the agreement, Lync and myself made.

Oliver

From: Rodgers, William (EEO)  
Sent: Monday, November 12, 2012 9:33 AM  
To: Snyder, Jim  
Cc: Giles, Michael (EEO); Schlueter, Hannah (EASZ/1); Thomas, Richard (EEO); Kata, Leonard (EEO);  
Schmidt, Oliver (EEO)  
Subject: RE: Decision Information - 2013 Jetta Hybrid

Hello Jim,

I have just been informed that a meeting is proposed between EPA and Volkswagen representatives to discuss this running change on Tuesday afternoon, Nov. 13th. I would ask that you wait to make your confirmatory test decision until the time of this meeting so all questions can be addressed.

Regards,

Bill Rodgers

Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com

From: Rodgers, William (EEO)  
Sent: Friday, November 09, 2012 1:34 PM  
To: Snyder, Jim  
Cc: Giles, Michael; Schlueter, Hannah (EASZ/1); Thomas, Richard (EEO); Kata, Leonard (EEO)  
Subject: Decision Information - 2013 Jetta Hybrid

Hello Jim,

We have submitted new fuel economy tests and the Decision Information Request to support a running change for the 2013 Jetta Hybrid, test group DVWXXV01.4PHE. This running change introduces a new FEDV to the test group which will represent the fuel economy for all 2013 Jetta Hybrid models from the Start of Production. These new tests require Manufacturer Confirmatory testing of FTP and HWY cycles due to high fuel economy for the ETW and Class. Because of this and due to critical timing of our model launch plans, we are requesting that EPA waive confirmatory testing.

Please contact Mike Giles (248) 754-4227 or Richard Thomas (248) 754-4213 in our office on Monday morning if possible to discuss this request.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Mon 11/12/2012 4:30:32 PM  
**Subject:** VW Group - Decision Info Audi R8 / R8 Spyder 4.2L

Hello Jim,

Today we submitted decision requests for MY 2013 Audi R8 (FEDV) and R8 Spyder (EDV) with 4.2L engine. This test group is a carryover and the new vehicles have the newer 7 speed automatic transmission .

Please let us know the decision status at your earliest convenience.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Wed 11/14/2012 2:18:28 PM  
**Subject:** Jetta Hybrid Testing

Hello Jim:

When we spoke yesterday, you stated that EPA is primarily interested in the US06 results when we bring the running change Jetta Hybrid in for confirmatory testing. You also mention (and I am paraphrasing) 'if the FTP and HWY are not good, we could use the data from the previous tests.' I just wanted to clarify which previous tests you are speaking about. Would these be the manufacturer's tests on the new running change vehicle, the EPA tests from the previous emission data vehicle, or something that I haven't thought of?

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Wed 11/14/2012 2:35:07 PM  
**Subject:** RE: Jetta Hybrid Testing  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[leonard.kata@vw.com](mailto:leonard.kata@vw.com)

Okay.

Thanks

Len

---

Leonard W. Kata

Senior Manager

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Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

From: [Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov) [mailto:[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)]  
Sent: Wednesday, November 14, 2012 9:32 AM  
To: Kata, Leonard (EEO)  
Cc: Thomas, Richard (EEO)  
Subject: Re: Jetta Hybrid Testing

The FTP and HWY from the previous EPA tests that were already close.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
Date: 11/14/2012 09:19 AM  
Subject: Jetta Hybrid Testing

Hello Jim:

When we spoke yesterday, you stated that EPA is primarily interested in the US06 results when we bring the running change Jetta Hybrid in for confirmatory testing. You also mention (and I am paraphrasing) 'if the FTP and HWY are not good, we could use the data from the previous tests.' I just wanted to clarify which previous tests you are speaking about. Would these be the manufacturer's tests on the new running change vehicle, the EPA tests from the previous emission data vehicle, or something that I haven't thought of?

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 11/14/2012 3:18:20 PM  
**Subject:** VW Group - Supplemental Information

Hello Jim,

I just submitted the supplemental information for the Jetta Hybrid.

Please advise us of the test schedule when it is confirmed. As you are aware we are requesting week of November 26.

Please let me know right away if there are any questions in the process on your end, and we will try to address.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** richard.thomas@vw.com[]  
**Cc:** oliver.schmidt@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 11/21/2012 10:09:16 PM  
**Subject:** re: 2011 CAFE Report

Richard,

re: 2011 CAFE Report

I couldn't find your 2011 CAFE model year report(s) in the Document Module of Verify. I looked in Verify for 2011 model year documents in the Compliance Document Type of "CAFE Model Year Report" and couldn't find any 2011 CAFE reports (the CAFE letter(s) to EPA).

When you get a chance, please email me a pdf copy of your 2011 CAFE report(s) for all applicable categories (Import pass car, Domestic pass car and Light Truck) and enter a copy in the Verify Document module.

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA; Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 11/28/2012 6:00:55 PM  
**Subject:** Hybrud Results

Good afternoon gentlemen,

As you are already aware, we are very interested in the numbers for the Hybrid test. If you are able to reply with the preliminary reports as soon as they become available, it would be greatly appreciated.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; incent Mazaitis/AA/USEPA/US@EPA;"Rodgers, William (EEO)" [William.Rodgers@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 11/28/2012 7:30:45 PM  
**Subject:** RE: Hybrid Results  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[hannah.schlueter@volkswagen.de](mailto:hannah.schlueter@volkswagen.de)  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[image001.gif](#)

Thanks for the quick turnaround Jim.

When you get a chance, could you also send the PDF of the preliminary report. We are interested in the bag details and State of Charge information which I think is only on this report...

Thanks!

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, November 28, 2012 2:23 PM  
To: Giles, Michael (EEO)  
Cc: Schlueter, Hannah (EASZ/1); Thomas, Richard (EEO); Mazaitis.Vincent@epamail.epa.gov; Rodgers, William (EEO)  
Subject: Re: Hybrid Results

Results are in Verify. According to my quick calculations, we are done.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA

Cc: "Schlueter, Hannah (EASZ/1)" <hannah.schlueter@volkswagen.de>, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 11/28/2012 01:01 PM  
Subject: Hybrud Results

Good afternoon gentlemen,

As you are already aware, we are very interested in the numbers for the Hybrid test. If you are able to reply with the preliminary reports as soon as they become available, it would be greatly appreciated.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

VW JETTA Hybrid r/c EPA confirmatory FE results				
11/27/2012				
	cty	hwy	us06 bg2	
epa	57.487	65.523	54.754	
vw	57.462	66.526	53.1	
	0.04%	-1.53%	3.02%	

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 11/28/2012 7:56:23 PM  
**Subject:** RE: Hybrid Results  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[hannah.schlueter@volkswagen.de](mailto:hannah.schlueter@volkswagen.de)  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[image001.gif](#)

Looking at the table, I am curious, can you tell us if there is a reason to consider only bag 2 below? I think for label they use the weighted number but we were curious about it.

Thanks,

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, November 28, 2012 2:23 PM  
To: Giles, Michael (EEO)  
Cc: Schlueter, Hannah (EASZ/1); Thomas, Richard (EEO); Mazaitis.Vincent@epamail.epa.gov; Rodgers, William (EEO)  
Subject: Re: Hybrid Results

Results are in Verify. According to my quick calculations, we are done.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA

Cc: "Schlueter, Hannah (EASZ/1)" <hannah.schlueter@volkswagen.de>, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 11/28/2012 01:01 PM  
Subject: Hybrud Results

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Thanks,  
Mike

Michael Giles  
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3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

VW JETTA Hybrid r/c EPA confirmatory FE results				
11/27/2012				
	cty	hwy	us06 bg2	
epa	57.487	65.523	54.754	
vw	57.462	66.526	53.1	
	0.04%	-1.53%	3.02%	

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 11/28/2012 9:42:29 PM  
**Subject:** FTP State of Charge

Hi Jim,

I have to leave the office, but if you have any feedback about the state of charge question this afternoon, please copy Hannah and Richard.

You can also call my phone – Hannah will be here until 6:30 and take any calls.

Thanks again for your help today.

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]; Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 11/29/2012 4:02:42 PM  
**Subject:** Hybrid Discussion

Hi Jim,

We would like to follow up our discussion about the Hybrid. Here are our current thoughts:

- For the FTP test, if the finding is that the EPA test is technically invalid, is it possible to accept the Mfr test? We would accept this in preference to a re-test.
  
- For the US06 test: After discussion, we have decided to waive the re-test. Therefore, the official FE test is the lower of the confirmatory test and the manufacturer test. We understand this to be based on Hwy portion (Bag 2). The lower Bag 2 result is from the Mfr, therefore this test would be used.
  
- For the Hwy test, there is no issue.

Let's talk when you get a chance to confirm our thoughts.

Thanks

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326



United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 11/29/2012 4:40:46 PM  
**Subject:** RE: Hybrid Discussion  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[hannah.schlueter@volkswagen.de](mailto:hannah.schlueter@volkswagen.de)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)

Thanks for the confirmation Jim!

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, November 29, 2012 11:33 AM  
To: Giles, Michael (EEO); Wehrly.Linc@epamail.epa.gov  
Cc: Schlueter, Hannah (EASZ/1); Thomas, Richard (EEO); Rodgers, William (EEO)  
Subject: Re: Hybrid Discussion

Yes, The EPA FTP test confirmed the emissions and fuel economy of the Mfr's FTP test. The only issue with the EPA test is the lack of SOC data but we had already confirmed passing SOC from the previous EPA FTP test. Using the Mfr FTP data is acceptable.

The EPA US06 confirmatory test exceeded the MFR's US06 Bag2 (highway portion) FE by 3.02%. Even though it was actually higher than the Mfr FE result, it doesn't confirm it since it is over 3% different. Therefore a retest is in order -or the Mfr can choose to accept the test with the lower result, which is the Mfr's US06 test in this case.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Schlueter, Hannah (EASZ/1)" <[hannah.schlueter@volkswagen.de](mailto:hannah.schlueter@volkswagen.de)>, "Rodgers, William (EEO)" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>, "Thomas, Richard (EEO)" <[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)>  
Date: 11/29/2012 11:02 AM  
Subject: Hybrid Discussion

Hi Jim,

We would like to follow up our discussion about the Hybrid. Here are our current thoughts:

- For the FTP test, if the finding is that the EPA test is technically invalid, is it possible to accept the Mfr test? We would accept this in preference to a re-test.
- For the US06 test: After discussion, we have decided to waive the re-test. Therefore, the official FE test is the lower of the confirmatory test and the manufacturer test. We understand this to be based on Hwy portion (Bag 2). The lower Bag 2 result is from the Mfr, therefore this test would be used.
- For the Hwy test, there is no issue.

Let's talk when you get a chance to confirm our thoughts.

Thanks  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Linc Wehrly/AA/USEPA/US@EPA;Jim Snyder/AA/USEPA/US@EPA[]; im  
Snyder/AA/USEPA/US@EPA[]  
**From:** "Schmidt, Oliver (EEO)"  
**Sent:** Fri 11/30/2012 12:25:48 AM  
**Subject:** Jetta Hybrid

Good evening,

I wrote a lot of "Thank you" emails today to the team members of the Jetta Hybrid development team that made the new software available so fast but I would like to take to opportunity to thank the two of you for supporting us in the way you did.

Thank you

Oliver

Oliver Schmidt  
+1 (248) 760-6180  
VWGoA EEO  
Sent by Blackberry

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 11/30/2012 7:35:27 PM  
**Subject:** VW Group - Decision Information for MY 2014 A8 3.0L TDI

Hi Jim,

I just submitted vehicle info, tests and a decision request for a MY 2014 Audi A8 3.0L TDI fuel economy vehicle.

This vehicle is an improved version of the vehicle tested earlier this year at EPA. As before, this vehicle has stop start technology. The vehicle now has software improvements to optimize fuel economy.

Please let us know of your decision at your earliest convenience, or call me if you have any questions.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 12/4/2012 2:45:28 PM  
**Subject:** RE: Hybrid Discussion  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Ok, please release it. I'll confirm about pickup today, I had heard it was in the plan already ...

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, December 04, 2012 8:46 AM  
To: Giles, Michael (EEO)  
Subject: RE: Hybrid Discussion

Mike, do you think you can pick up the Jetta today? There is a technology fair in the lab tomorrow and they're trying to clear the lab out.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; inccent Mazaitis/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 12/4/2012 4:00:23 PM  
**Subject:** RE: Hybrid Discussion  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Jim / Vince,

Just to confirm, Brian will be there around 3 or 3:30 to drop off a Beetle for the fair and pick up the Jetta Hybrid.

From: Giles, Michael (EEO)  
Sent: Tuesday, December 04, 2012 9:45 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: RE: Hybrid Discussion

Ok, please release it. I'll confirm about pickup today, I had heard it was in the plan already ...

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, December 04, 2012 8:46 AM  
To: Giles, Michael (EEO)  
Subject: RE: Hybrid Discussion

Mike, do you think you can pick up the Jetta today? There is a technology fair in the lab tomorrow and they're trying to clear the lab out.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 12/5/2012 3:30:57 PM  
**Subject:** 2014 Certificate Requests - Audi R8 / Lamborghini Gallardo

Hello Jim,

I have uploaded the Initial Applications and submitted Certificate Requests for the following 2014 model year Audi test groups. These are both carryover test groups with new fuel economy and worst case emissions data for all Audi R8 models, the Lamborghini Gallardo 5.2L (FEDV) models continue to use data carried over from previous model years.

- EADXV04.2375 – 2014 Audi R8 V8 models
- EADXV05.2LR8 – 2014 Audi R8 V10 and Lamborghini Gallardo models

The 2014 VW Group Certification Preview and Pre Model Year GHG report is forthcoming in the coming weeks, we will contact you to arrange a meeting on these topics. In the meantime, we would appreciate your review of the submitted 2014 applications to expedite the processing of these certificates after we have completed our preview meeting with you.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com





**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 12/11/2012 9:47:32 PM  
**Subject:** FW: A8 Security

Hello Jim,

Our Audi factory in Neckarsulm is asking us about the possibility of certifying an armored version of the A8 for the US with the 4.0L V8 engine. They gave us sparse details so far, but the initial question was if it could be included with an existing passenger car test group. The text of the inquiry was as follows:

"... Audi sales is asking for the possibility to bring a A8 armored version to the U.S.

They want to use the V8 TFSI in this version. Unfortunately the min weight would be approx. 8047lbs, maximum weight would be 9370lbs.

Is there a chance to cover this version with the V8 TFSI test group?

We used the worst case variant for FE & emissions (Bentley GT/GTC) already and the max inertia weight class for PC is 5500lbs anyway.

However, the A8 armored would be heavier..."

After some checking of the regulations (see for example definitions in 86.1803), our thoughts were as follows:

- There seems to be no specific upper weight limit on classification of vehicles as "LDV", however the definition for HDV states "... any vehicle 8,500# GVWR or > 6,000 curb weight...". Therefore, we believe the vehicle would need to be certified as an HDV, or possibly a MDPV/HDV if the GVWR is less than 10,000#. It was not clear from the description if we move over into HDV only but it seems possible .
- HDV's have the option to be tested on a dyno if < 14,000# GVWR (as opposed to testing engine only which is also an option).
- We believe any HDV or MDPV/HDV would need to be classified in their own test group separate

from any LDV's.

- Any MDPV /HDV fleet emissions would likely need to be included with LDT4 for fleet average NOx, GHG, CAFÉ.
- OBD could most likely be based on the existing/similar LDV OBD group. However, the requirements would also be less stringent for the HDV class.

Could you let us know your feedback on our assumptions above, or if you notice anything we may have overlooked at this early stage.

Best Regards,

Mike

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Thur 12/13/2012 10:56:02 PM  
**Subject:** 2014MY Certification Preview

Hi Jim:

The Volkswagen Group 2014MY Certification Preview material should be submitted to EPA tomorrow. If possible, we would like to meet with you to discuss. Would you have any time available early next week? It would be nice to complete this task before the holidays.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 12/14/2012 1:00:50 PM  
**Subject:** RE: FW: A8 Security  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)

Thanks for the quick reply Jim.

We don't have weight details yet. But, it seems Audi is interested in keeping this in an existing test group, so it is good to hear that it may be possible. We will follow up when we get more info.

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, December 13, 2012 5:39 PM  
To: Giles, Michael (EEO)  
Cc: Kata, Leonard (EEO); Rodgers, William (EEO)  
Subject: Re: FW: A8 Security

Hi Mike, I've been looking into this since and conferring with colleagues since don't normally deal with Heavy Duty. I think you are on the right track. I had some comments below. Can you clarify, are you referring to curb, test weight or ALVW in your comments? I assumed curb weight. Is Audi interested in keeping this in the existing test group?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>, "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>

Date: 12/11/2012 04:49 PM  
Subject: FW: A8 Security

Hello Jim,

Our Audi factory in Neckarsulm is asking us about the possibility of certifying an armored version of the A8 for the US with the 4.0L V8 engine. They gave us sparse details so far, but the initial question was if it could be included with an existing passenger car test group. The text of the inquiry was as follows:

"... Audi sales is asking for the possibility to bring a A8 armored version to the U.S. They want to use the V8 TFSI in this version. Unfortunately the min weight would be approx. 8047lbs, maximum weight would be 9370lbs. Is there a chance to cover this version with the V8 TFSI test group? We used the worst case variant for FE & emissions (Bentley GT/GTC) already and the max inertia weight class for PC is 5500lbs anyway. However, the A8 armored would be heavier..."

After some checking of the regulations (see for example definitions in 86.1803), our thoughts were as follows:

- There seems to be no specific upper weight limit on classification of vehicles as "LDV", however the definition for HDV states "... any vehicle 8,500# GVWR or > 6,000 curb weight...". Therefore, we believe the vehicle would need to be certified as an HDV, or possibly a MDPV/HDV if the GVWR is less than 10,000#. It was not clear from the description if we move over into HDV only but it seems possible. I found an unofficial reference to a LDV weight limit of 5750 but haven't found that in the CFR. I don't think that is correct and I'm not convinced the ">6,000 curb weight" applies to LDV either. That said, I think this could qualify as a MDPV if under 10,000# GVW. Otherwise as a HDV if the GVW is over 10,000. Do you know the GVW yet?
- HDV's have the option to be tested on a dyno if < 14,000# GVWR (as opposed to testing engine only which is also an option).
- We believe any HDV or MDPV/HDV would need to be classified in their own test group separate from any LDV's. Whether its a LDV, MDPV or HDV, I don't see anything in the regs preventing you from including it in the existing test group if it met the same LDV Bin level emissions and OBD requirements. It would be a new worst case EDV.
- Any MDPV /HDV fleet emissions would likely need to be included with LDT4 for fleet average NOx, GHG, CAFÉ. Probably, I haven't looked into this much.
- OBD could most likely be based on the existing/similar LDV OBD group. However, the requirements would also be less stringent for the HDV class.

Could you let us know your feedback on our assumptions above, or if you notice anything we may have overlooked at this early stage.

Best Regards,  
Mike



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** [Ex. 7]@arb.ca.gov; [Ex. 7]@arb.ca.gov; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Fri 12/14/2012 1:47:02 PM  
**Subject:** Volkswagen Group 2014 Certification Preview

Hello Jim,

On behalf of the Volkswagen Group, we have submitted our 2014 Certification Preview letter to the Verify system for your review. This letter was also submitted to the California ARB DMS system for their review. We are requesting that our ARB Certification representative, [Ex. 7] be allowed to call into the preview meeting currently being arranged at EPA for Wednesday, Dec 19th at 1:00PM EST (10AM Pacific). Please contact Len Kata when a conference room has been decided so a call in number can be established.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Fri 12/14/2012 3:30:30 PM  
**Subject:** RE: 2014MY Certification Preview  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)  
[leonard.kata@vw.com](mailto:leonard.kata@vw.com)

Hi Jim:

Thanks for the info. Our numbers will be limited (1 or 2).

By the way, I haven't set this up yet, but would you have any objection to ARB Ex. 7 listening in by telephone?

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

From: [Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov) [<mailto:Snyder.Jim@epamail.epa.gov>]  
Sent: Thursday, December 13, 2012 6:28 PM

To: Kata, Leonard (EEO)  
Subject: Re: 2014MY Certification Preview

Well I scheduled it but so far all I could get was our room with the round table. Don't wear a heavy sweater that day.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/13/2012 05:56 PM  
Subject: 2014MY Certification Preview

Hi Jim:

The Volkswagen Group 2014MY Certification Preview material should be submitted to EPA tomorrow. If possible, we would like to meet with you to discuss. Would you have any time available early next week? It would be nice to complete this task before the holidays.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 12/17/2012 4:32:44 PM  
**Subject:** 2012 Final Common Section Extension Request

Hello Jim,

We have uploaded a request for approval letter for your consideration regarding a 90-day extension of our 2012 Final Common Section submission. Please review and provide approval at your earliest convenience.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 12/17/2012 8:29:30 PM  
**Subject:** RE: bev and PHEV spreadsheets  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Sure. That would have been Richard Thomas and Hannah Schlueter.

Bill

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, December 17, 2012 3:24 PM  
To: Rodgers, William (EEO)  
Cc: Kata, Leonard (EEO)  
Subject: Fw: bev and PHEV spreadsheets

Bill, at a previous meeting someone asked if we had a spreadsheet calculator for PHEVs and EVs. Here's what we have. They aren't very polished yet. I think it was Peter or Klaus that asked. Can you forward it to the right person?  
Thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Giles, Michael (EEO)"  
[michael.giles@vw.com]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Mon 12/17/2012 8:46:31 PM  
**Subject:** Accepted: VW Pre-Cert Mtg Rm C126

**To:** Jim Snyder/AA/USEPA/US@EPA; [Ex. 7]@arb.ca.gov;  
[Ex. 7]@arb.ca.gov; inc Wehrly/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Rodgers, William (EEO)"  
[William.Rodgers@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Tue 12/18/2012 7:56:52 PM  
**Subject:** VW Group Model Year 2014 SCR / AECD Approval Request for 3.0L TDI test group  
EADXJ03.04UG

Hello Jim, Linc and [Ex. 7]

Today we submitted a request for approval for SCR / AECD for our Model Year 14 3.0L TDI test group EADXJ03.04UG. This request is contained in a (single) PDF document including cover letter and supporting pages,

submitted under the following names:

EPA VERIFY: CBI\_EADXJ03.04UG\_RFA\_SCR\_R00

ARB DMS: CBI\_VOLK\_CORRESP\_RFA1SCR\_.PDF (see workflow  
2014\_CBI\_VOLK\_CORRESP\_RFA1SCR\_)

This MY 14 test group is based on the same engine used in current test groups for Q7 / Touareg but will now include several PC models (A6,A7,A8, A8L) as well as one light truck (Q5).

In addition, this test group will be amongst our first for MY14 certification, therefore we would kindly ask you to review this at your earliest convenience. Please contact me if you have any questions about this request.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Kata, Leonard (EEO)"  
**Sent:** Tue 12/18/2012 9:53:05 PM  
**Subject:** RE: VW Certification Preview  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Hello Jim:

I will bring copies of the materials. Also, Dale Harris from my group will join me; so two from VW.

Best regards,

Len

---

Leonard W. Kata

Senior Manager

Emission Regulations and Certification

Engineering and Environmental Office

Volkswagen Group of America, Inc.

Phone: (248) 754-4204

Cell: (248) 797-3886

E-Mail: [leonard.kata@vw.com](mailto:leonard.kata@vw.com)

From: [Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov) [mailto:[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)]  
Sent: Tuesday, December 18, 2012 3:37 PM  
To: Kata, Leonard (EEO)  
Subject: VW Certification Preview



Len that's fine. Also, we are in the lobby room now so lots of room. I saw the pre-cert letter in Verify and printed it out. Are you bringing hardcopies or sending a revised version? Just wondering whether or not to make copies.

[IMAGE]

Hi Jim:

As we have mentioned, ARB would like the opportunity to listen in on the VW Certification Preview Meeting. I confirmed this earlier today with **Ex. 7** our ARB certification representative. I have set up a call-in number and notified Bill McDuffee.

Just FYI, the number and conference ID are shown below. I would appreciate having a speaker telephone available in the meeting room (I think that this is usually the case).

(P.S. Does the room change mean I can wear a heavier sweater now?)

Best regards,

Len

Join by Phone

**Ex. 6**

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 12/19/2012 6:59:07 PM  
**Subject:** VW Group - Decision Information Submitted for Beetle Convertible TDI

Hello Jim,

Today we submitted vehicle information, test data and decision information for the Beetle Convertible TDI. As a reminder, this vehicle is an FEDV, and is a replacement for a previous vehicle which had a confirmatory test at EPA, but was deemed un-representative due to a mis-fueling event.

If you could, please let me know when you process the decision request. The VERIFY notification emails / broadcasts seem to not be working lately.

Otherwise, I hope you have an enjoyable and relaxing holiday break!

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Thur 12/20/2012 8:01:13 PM  
**Subject:** Page 8.1 - common section  
Page\_8.1\_CBI\_EVWXB\_COMMON\_APP\_INI\_R03.pdf

Hi Jim,

I found the missing page from the common section. I will submit a R03 of the common by Friday at latest.

Michael Giles

Certification Specialist

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United States of America

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Section 8	Pg. 1	Emission Testing Waiver	Engine Code	R.CH-No.:	Revision Date
Test Group		all	All		

8. Emission Testing Waiver Statements

*High Altitude Exhaust Emissions Compliance Statement*

In accordance with 40 CFR 86.1829-01 (b) (1) (ii) (B), The Volkswagen Group hereby certifies that, based upon engineering evaluation and high altitude emission tests conducted on similar vehicles, all vehicles of this test group comply with the high altitude exhaust emissions requirements.

*High Altitude Evaporative/Refueling Emissions Compliance Statement*

In accordance with 40 CFR 86.1829-01 (b) (2) (ii) (B), The Volkswagen Group hereby certifies that, based upon engineering evaluation and high altitude evaporative/refueling tests conducted on similar vehicles, all vehicles of this test group comply with the high altitude evaporative/refueling emissions requirements.

*Particulate Matter (PM)*

In accordance with 40 CFR 86.1829-01(b) (1) (iii) (B), The Volkswagen Group states that, based on good engineering judgment the vehicles of this test group are of a design substantially similar to existing designs that have particulate levels significantly below the standard, and that this vehicle design is expected to have similar characteristics. We therefore certify that, all vehicles of this test group comply with the particulate matter emissions requirements.

*Diesel Refueling Emissions Statement*

In accordance with 40 CFR 86.1810-01(2)(m) and based upon engineering evaluation the Volkswagen Group hereby certifies that due to the low vapor pressure of diesel fuel and the vehicle tank temperatures, hydrocarbon vapor concentrations are low and all vehicles of this test group comply with the 0.20 grams/gallon standard without a control system.

*Formaldehyde Emissions Compliance Statement*

In accordance with 40 CFR 86.1829-01(b)(1)(iii)(E), and based upon good engineering judgment, the Volkswagen Group hereby states that vehicles certified based upon NMHC emissions comply with the applicable formaldehyde emission standards.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Harris, Dale (EEO)"  
**Sent:** Fri 12/21/2012 3:05:28 PM  
**Subject:** VW GHG Pre Model Report  
[@vw.com](mailto:Leonard.Kata@vw.com)  
<http://www.volkswagengroupamerica.com/>

Jim

This note is intended to make you aware of that the 2014 GHG Pre Model year report has been submitted via the Verify system. The filename is:

CBI\_EVWXV\_COMMON\_CR1\_CAR.PDF

Thanks!!!

Regards,

Dale Harris

Certification Specialist

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office (EEO)  
2930 Technology Drive

Rochester Hills Michigan 48309

United States of America

P: +1 248 754-4218

E: Dale.Harris@vw.com

<http://www.volkswagengroupamerica.com/>

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**To:** oliver.schmidt@vw.com;richard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; ichard.thomas@vw.com;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** john.finneran@nhtsa.dot.gov;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=Jeff Alson/OU=AA/O=USEPA/C=US@EPA;CN=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=Ben Ellies/OU=AA/O=USEPA/C=US@EPA;Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; Harry.Thompson@dot.gov;terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; terry.anderson@dot.gov;CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; N=Aaron Hula/OU=AA/O=USEPA/C=US@EPA;Henrietta.Dandy@dot.gov[]; enrietta.Dandy@dot.gov[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Wed 1/2/2013 6:09:30 PM  
**Subject:** EPA CAFE letter & calculation attached - 2011 VW Group IP, LT  
[2011 VWX LT 20121206 101129 CAFE.pdf](#)  
[2011 VWX IP 20121206 102046 CAFE.pdf](#)

This e-mail message forwards a signed EPA letter and Corporate Average Fuel Economy (CAFE) calculation to your office.

This e-mail and the Adobe Acrobat (.pdf) attachment are an official Agency action. If there is a problem with the attachment or if you are not the intended recipient, please contact your certification team representative immediately. Adobe Acrobat Reader version 5.0 or later is required to open the attached PDF document(s).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ANN ARBOR, MICHIGAN 48105  
OFFICE OF TRANSPORTATION AND AIR QUALITY

January 02, 2013

Dr. Oliver Schmidt  
General Manager  
Engineering and Environmental Office  
Volkswagen Group of America  
3800 Hamlin Road  
Auburn Hills, MI 48326

Dear Dr. Schmidt:

This letter serves to formally acknowledge the receipt of your 2011 final average fuel economy calculation for Light Trucks. The EPA-calculated and the manufacturer-submitted mpg values for this calculation are shown on the enclosed 'CAFE Report' page of EPA's calculation.

In accordance with 40 CFR 600.510-08(e), we calculated an adjusted final value of 27.1 mpg; this value will serve as our official determination.

A copy of the calculation is enclosed.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Linc Wehrly", written over a rectangular box.

Linc Wehrly, Center Director  
Light-Duty Vehicle Center  
Compliance Division

Enclosures

cc: J. Finneran, NHTSA





VERIFY ENGINE AND VEHICLE COMPLIANCE SYSTEM  
CORPORATE AVERAGE FUEL ECONOMY (CAFE) REPORT  
MANUFACTURERS FUEL ECONOMY CALCULATION FOR MODEL YEAR 2011

Report Date: January 02, 2013  
Manufacturer Name: Volkswagen Group of America  
Compliance Category: Light Trucks  
Official Production: 64,780  
Official CAFE Value: 27.1 mpg  
Official CAFE Standard: 26.0 (Reformed)

Submitted by Mfr: March 13, 2012, Transaction ID: \_99c52bfd-38eb-4598-b857-9dd34b851dad

	<u>EPA Calculation</u>	<u>Mfr Calculation</u>	<u>Calc Warnings</u>
--	------------------------	------------------------	----------------------

Unadjusted Unrounded:	27.1483	27.1483	-
Unadjusted Rounded:	27.1	27.1	-
Adjusted (TPA) Unrounded:	27.1483	N/A	-
Adjusted (TPA) Rounded:	27.1	N/A	-

<u>Final Calculation (Incl AMFA credit)</u>			
Unadjusted Unrounded:	27.1483	27.1483	-
Unadjusted Rounded:	27.1	27.1	-
Adjusted (TPA) Unrounded:	27.1483	N/A	-
Adjusted (TPA) Rounded:	27.1	N/A	-

Total Production Volume:			-
CAFE Value:	27.1	<u>Ex 4 - CBI</u> 27.1	-

Statistics

Model Types:	10
Base Levels:	11
Configurations:	11
Tested:	11
<u>Ex 4 - CBI</u>	
Tested Production Volume Pct:	100.0000% (100%)
Subconfigurations:	11
Tested:	11

**EX. 4 - CBI**

LDFE_CAFE_ID	247	(N)	Final=N	2012-02-14 13:29:31	928000	403a2b0f5-121e-4d34-a870-480843968faa
LDFE_CAFE_ID	268	(C)	Final=N	2012-02-24 11:20:30	316000	21bab595-99ff-4c5e-8d21-d8211600c016
LDFE_CAFE_ID	262	(C)	Active=N	2012-03-07 07:06:48	706000	b1bae458-7f29-429e-b006-6e-4204349e3
LDFE_CAFE_ID	266	(C)	Active=N	2012-03-09 09:52:08	040000	79ae03d4-6f1b-4f71-6049-d8b13b1c3419
LDFE_CAFE_ID	272	(C)	Final=Y	2012-03-13 13:14:00	504000	99c52b04-39eb-4599-b857-9d434b851dad

Mr. Richard E Thomas Jr.

Truck

Baseline Calculation:		
Unrounded Unadjusted	27,1483	27,1483
Unrounded Unadjusted (TPA)	27.1	27.1
Unrounded Adjusted (TPA)	-	27,1483

Final Calculation:		
Unrounded Unadjusted	27,1483	27,1483
Unrounded Unadjusted (TPA)	27.1	27.1
Unrounded Adjusted (TPA)	-	27,1483

Ex. 4 - CBI

Dual Fuel  
0  
0.0%

Final Production Volume	27,1483
Footprint Production Volume	27,1483
Official CAFE MPG	27.1
Unrounded Reformatted Standard	28.0276
Rounded Reformatted Standard	28.0
Reformatted Standard Comment	(none)

Calc ID	MT-CD	MT Index	DomImp	TLAAS	Dvsn CD	CarLn CD	Division Name	Carline Name	Engine	Fuel(s)	Trans	Lockup	Creep	Drv Sys	Prd Vol	Tst Vol	Cy FE	Baseline Fuel	Hwy FE	Cmb FE	Prd Vol	Dual Fuel	Alt Fuel	Cmb FE	Alt Fuel	Cmb FE
006897	ADX	009	Import	Null	1	330	Audi	OS	2.0 TC	GP	SAB	Y	N	A	24,600,000	35,800,000	28,659,400	-	-	-	-	-	-	-	-	
006892	ADX	015	Import	Null	1	330	Audi	OS	3.2 NA	GP	SAB	Y	N	A	22,700,000	30,700,000	25,715,600	-	-	-	-	-	-	-	-	
006894	ADX	043	Import	Null	1	320	Audi	Q7	3.0 SC	GP	SAB	Y	N	A	19,249,972	29,612,936	22,901,338	-	-	-	-	-	-	-	-	
006900	ADX	049	Import	Null	1	320	Audi	Q7	3.0 TC	DU	SAB	Y	N	A	21,300,000	37,400,000	26,417,600	-	-	-	-	-	-	-	-	
006895	ADX	049	Import	Null	2	140	Volkswagen	TIGUAN	3.0 TC	GP	SAB	Y	N	A	23,400,000	40,700,000	28,934,500	-	-	-	-	-	-	-	-	
006893	VWXX	041	Import	Null	2	165	Volkswagen	TIGUAN	2.0 TC	GP	SAB	Y	N	A	24,000,000	34,600,000	28,102,200	-	-	-	-	-	-	-	-	
006891	VWXX	042	Import	Null	2	180	Volkswagen	TIGUAN	2.0 TC	GP	SAB	Y	N	F	21,700,000	35,800,000	26,374,500	-	-	-	-	-	-	-	-	
006896	VWXX	069	Import	Null	1	140	Volkswagen	TIGUAN	2.0 TC	GP	M6	N	N	F	21,700,000	35,800,000	26,374,500	-	-	-	-	-	-	-	-	
006899	VWXX	077	Import	Null	1	145	Volkswagen	Touareg Hybrid	3.6 NA	GP	SAB	Y	N	A	21,300,000	31,600,000	24,961,200	-	-	-	-	-	-	-	-	
006898	VWXX	077	Import	Null	1	145	Volkswagen	Touareg Hybrid	3.6 SC	GP	SAB	Y	N	A	25,100,000	33,100,000	28,163,100	-	-	-	-	-	-	-	-	

Ex. 4 - CBI

Light Truck

Ex. 4 - CBI

Ex. 4 - CBI

Footprint Based Standards Calculations  
CAFE Submission: 272 (Active = Y)

MT CD	Dvsn CD	CarLn CD	Division Name	Carline Name	FP Index	Footprint Description	Front TW	Rear TW	Wht Base	Sq Ft	Trgt FE	Ttk Vol	Weighted Truck
ADX	1	320	Audi	Q7	1	Audi Q7 3.0T 255/55R18	64.8	65.9	118.2	53.7	-	-	-
ADX	1	320	Audi	Q7	2	Audi Q7 3.0L TDI 255/50R19	64.3	65.5	118.2	53.3	-	-	-
ADX	1	330	Audi	Q6	1	Audi Q6 3.2L 235/50R18	63.7	63.5	110.5	48.8	-	-	-
ADX	2	140	Volkswagen	TOUAREG	2	Touareg VR6 3.2L 235/55R18	63.7	63.5	110.5	48.8	-	-	-
ADX	2	140	Volkswagen	TOUAREG	1	Touareg VR6 3.2L 235/55R18	63.0	63.7	113.9	51.7	-	-	-
ADX	2	165	Volkswagen	TIGUAN	1	Tiguan 2.0T 255/55R16	61.8	61.9	102.5	44.0	-	-	-
VWXX	1	140	Volkswagen	TOUAREG	1	Touareg VR6 3.2L 235/55R18	65.0	65.7	113.9	51.7	-	-	-
VWXX	1	145	Volkswagen	Touareg Hybrid	1	Touareg Hybrid 285/55CR19	64.5	65.3	113.9	51.3	-	-	-
Totals							Unrounded Standard						
							Rounded Standard						

Ex. 4 - CBI



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ANN ARBOR, MICHIGAN 48105  
OFFICE OF TRANSPORTATION AND AIR QUALITY

January 02, 2013

Dr. Oliver Schmidt  
General Manager  
Engineering and Environmental Office  
Volkswagen Group of America  
3800 Hamlin Road  
Auburn Hills, MI 48326

Dear Dr. Schmidt:

This letter serves to formally acknowledge the receipt of your 2011 final average fuel economy calculation for Import Passenger Vehicles. The EPA-calculated and the manufacturer-submitted mpg values for this calculation are shown on the enclosed 'CAFE Report' page of EPA's calculation.

In accordance with 40 CFR 600.510-08(e), we calculated an adjusted final value of 33.9 mpg; this value will serve as our official determination. This official value includes 0.1 mpg increase in average fuel economy attributed to manufacturing incentives for alternative fuel, dual-fuel automobiles, ref 49 U.S.C 32905.

A copy of the calculation is enclosed.

Sincerely yours,

Linc Wehrly, Center Director  
Light-Duty Vehicle Center  
Compliance Division

Enclosures

cc: J. Finneran, NHTSA



VERIFY ENGINE AND VEHICLE COMPLIANCE SYSTEM  
CORPORATE AVERAGE FUEL ECONOMY (CAFE) REPORT  
MANUFACTURERS FUEL ECONOMY CALCULATION FOR MODEL YEAR 2011

Report Date: January 02, 2013  
Manufacturer Name: Volkswagen Group of America  
Compliance Category: Import Passenger Vehicles  
Official Production: **Ex. 4 - CBI**  
Official CAFE Value: **33.9 mpg**  
Official CAFE Standard: 30.7 (Reformed)

Submitted by Mfr: May 09, 2012, Transaction ID: \_0ef59c1a-0719-427d-8af9-39f9b514a148

	<u>EPA Calculation</u>	<u>Mfr Calculation</u>	<u>Calc Warnings</u>
--	------------------------	------------------------	----------------------

Baseline Calculation (No AMFA credit)			
Unadjusted Unrounded:	33.5336	33.5336	-
Unadjusted Rounded:	33.5	N/A	-
Adjusted (TPA) Unrounded:	33.7809	33.7810	MINOR
Adjusted (TPA) Rounded:	33.8	33.8	-

Final Calculation (Incl AMFA credit)			
Unadjusted Unrounded:	33.6127	33.6127	-
Unadjusted Rounded:	33.6	N/A	-
Adjusted (TPA) Unrounded:	33.8606	33.8607	MINOR
Adjusted (TPA) Rounded:	33.9	33.9	-

Total Production Volume:			-
CAFE Value:	<b>Ex. 4 - CBI</b> 33.9	33.9	-

Statistics	
Model Types:	64
Base Levels:	64
Configurations:	85
Tested:	85
Tested Production Volume:	
Tested Production Volume Pct:	<b>Ex. 4 - CBI</b> 151
Subconfigurations:	151
Tested:	151
Tested Production Volume:	
Tested Production Volume Pct:	<b>Ex. 4 - CBI</b>



010277	VWVX	068	Import	Null	1	225	Volkswagen	JETTA SPORTWAGEN	2.0 TC	DU	M6	N	N	F	38.759400	60.013800	46.106900	-	-	-	-	38.759400	60.013800	46.106900
010315	VWVX	158	Import	Null	1	216	Volkswagen	EOS	2.0 TC	GP	M6	N	N	F	26.062200	41.318900	31.255600	-	-	-	-	26.062200	41.318900	31.255600
809																								

Import Passenger Vehicle

Config Tested % = 100 x TestedProdVol / TotalProdVol = 100 x 268556 / 268556 = 100.0000000000% = 100%  
SFTW3000 = TotalProdVol@ITW3000 / TotalProdVol = 18418 / 268556 = 0.0686000000 = 0.0686  
SFTW4000 = TotalProdVol@ETW4000 / TotalProdVol = 25883 / 268556 = 0.0964000000 = 0.0964

EX. 4 - CBI

Footprint Based Standards Calculations  
CAFE Submission: 381 (Active = Y)

Mfr Cd	Dvsr CD	CarLn Cd	Division Name	Carline Name	FP Index	Footprint Description	Front Tlw	Rear Tlw	WhlBase	Ratemed CAFE Standard Calculation		Wghted Import
										SqFt	Tgr FE	Imp Vol
ADX	1	10	Audi	A4	1	A4 quattro 225/50R17	61.1	60.6	110.6	46.7	30.48	
ADX	1	20	Audi	A4 AVANT QUATTRO	1	A4 Avant quattro 225/50R17	61.1	60.6	110.6	46.7	30.48	
ADX	1	25	Audi	S4	1	S4 245/40R18	60.9	60.4	110.6	46.5	30.55	
ADX	1	30	Audi	TT COUPE QUATTRO	1	TT Coupe quattro 255/35R19	61.2	60.9	97.0	41.1	31.16	
ADX	1	37	Audi	TT ROADSTER QUATTRO	1	TT Roadster quattro 255/35R19	61.2	60.9	97.0	41.1	31.16	
ADX	1	38	Audi	A5 QUATTRO	1	A5 quattro 245/40R18	62.3	61.8	108.3	46.8	30.52	
ADX	1	42	Audi	S5	1	S5 255/35R19	62.5	62.0	108.3	46.8	30.45	
ADX	1	51	Audi	A5 Cabriolet	1	A5 Cabriolet 245/40R18	62.5	62.0	108.3	46.8	30.45	
ADX	1	53	Audi	A6 Cabriolet quattro	1	A6 Cabriolet quattro 245/40R18	62.5	62.0	108.3	46.8	30.45	
ADX	1	56	Audi	S5 Cabriolet	1	S5 Cabriolet 255/35R19	62.3	61.8	108.3	46.6	30.52	
ADX	1	65	Audi	A3	1	A3 225/45R17	59.9	58.8	101.5	41.9	31.14	
ADX	1	66	Audi	A3 QUATTRO	1	A3 quattro 225/45R17	59.9	58.8	101.5	41.9	31.14	
ADX	1	75	Audi	A6 QUATTRO	1	A6 quattro 245/45R7	62.4	62.7	111.9	46.6	28.54	
ADX	1	76	Audi	S6	1	S6 255/35R18	62.4	62.7	111.9	46.6	28.54	
ADX	1	78	Audi	A6 AVANT QUATTRO	1	A6 Avant quattro 245/45R17	62.4	62.7	111.9	46.6	28.54	
ADX	1	80	Audi	R8	1	R8 235 x 295/30R19	64.3	62.8	104.3	46.1	30.66	
ADX	1	90	Audi	R8 Spyder	1	R8 Spyder 235 and 285/35R19	64.3	62.8	104.3	46.1	30.66	
ADX	1	92	Audi	A8	1	A8 285/40R19	64.9	64.5	117.8	52.9	25.88	
ADX	1	95	Audi	A8L	1	A8L 285/40R19	64.9	64.5	117.8	52.9	24.69	
ADX	1	96	Audi	GTI	1	GTI 225/40R18	60.4	59.6	101.5	42.3	31.12	
ADX	2	211	Volkswagen	CC	1	CC 235/45R17	61.1	61.4	106.7	45.3	30.84	
ADX	2	293	Volkswagen	Gallardo Coupe	1	Gallardo Coupe 235 and 283/30R19	64.3	62.9	100.8	44.5	30.96	
ADX	3	406	Lamborghini	Gallardo Spyder	1	Gallardo Spyder 235 and 283/30R19	64.3	62.9	100.8	44.5	30.96	
ADX	3	426	Lamborghini	Miluslane	1	Miluslane 285/45R20	63.1	64.3	126.8	56.9	24.30	
BEX	1	15	Bentley	Continental Flying Spur	1	Continental Flying Spur 245/40R19	63.3	64.3	126.8	56.9	24.30	
BEX	1	16	Bentley	Continental Supersports	1	Continental Supersports 275/35R20	63.3	64.3	126.8	56.9	24.30	
BEX	1	40	Bentley	Continental Supersports	1	Continental Supersports 275/35R20	63.7	65.2	108.1	46.3	28.74	
BEX	1	50	Bentley	Continental Supersports	1	Continental Supersports 275/35R20	63.7	65.2	108.1	46.3	28.74	
BGT	1	55	Bugatti	Veyron	1	Veyron	67.9	63.8	106.7	48.8	28.61	
VWX	1	206	Volkswagen	GOLF	1	Golf (TDI) 225/45 R17	60.1	59.0	101.5	42.0	31.13	
VWX	1	206	Volkswagen	GOLF	2	Golf 195/65 R15	60.6	59.6	101.5	42.4	31.12	
VWX	1	216	Volkswagen	EOS	1	Eos 235/45R17	60.7	60.8	101.5	42.9	31.08	
VWX	1	221	Volkswagen	Jetta	1	Jetta 205/65 R16	60.4	60.4	104.4	43.8	31.03	
VWX	1	221	Volkswagen	Jetta	2	Jetta (M/P) 195/65 R15	60.6	60.7	104.4	43.9	31.02	
VWX	1	253	Volkswagen	Jetta Sportwagen	1	Jetta Sportwagen 205/65 R16	61.1	60.4	106.7	45.3	31.42	
VWX	1	253	Volkswagen	CC	1	CC 235/40 R18	61.1	61.4	106.7	45.3	30.84	
VWX	1	298	Volkswagen	CC MOTION	1	CC Motion 235/40 R18	59.9	58.8	101.5	41.9	31.14	
VWX	2	65	Audi	A3	1	A3 225/45R17	59.9	58.8	101.5	41.9	31.14	

EX. 4 - CBI

EX. 4 - CBI

Totals  
Unrounded Standard  
Rounded Standard

EX. 4 - CBI

**To:** Robert Peavyhouse/AA/USEPA/US@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Thomas, Suanne (EEO)" [Suanne.Thomas@vw.com]; Thomas, Suanne (EEO)" [Suanne.Thomas@vw.com]; Giles, Michael (EEO)" [michael.giles@vw.com]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Schlueter, Hannah (EASZ/1)" [hannah.schlueter@volkswagen.de]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 1/2/2013 8:04:30 PM  
**Subject:** Volkswagen Group 2013/14 Federal-Only Request for OBD Approval  
CBI DVWXV02.0B5F RFA OBD R00.PDF  
EPA Verify Submission 01022013.pdf

Hello Bob,

We are submitting the attached Request for OBD Approval for the 2013/14 model year Federal-Only Test Groups DVWXV02.0B5F and EVWXV02.0B5F (OBD Groups DVW-TFSIN and EVW-2.0-1.8T-G3). This request represents the next generation of Volkswagen gasoline direct injection I4-turbo engines to be offered in 1.8 Liter and 2.0 Liter displacements beginning in early March 2013. A member of our staff will soon be in touch with you to arrange a meeting with you on this topic. The attached CBI file has also been uploaded to the Verify system.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

william.rodgers@vw.com



**Submission accepted for your file upload CBI\_DVWXV02.0B5F\_RFA\_OBD\_R00.PDF**

- From: Verify Administrator
- Date: 1/2/2013 2:43:17 PM

Your recent submission for the file upload CBI\_DVWXV02.0B5F\_RFA\_OBD\_R00.PDF has been received by EPA. You will be notified if any additional actions on your part are required

The following document identifier has been assigned to this request:

\_8273b265-cc64-4a28-8d20-404ed028ea8a

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Document Name: CBI\_DVWXV02.0B5F\_RFA\_OBD\_R00.PDF

Transaction Identifier: \_8273b265-cc64-4a28-8d20-404ed028ea8a

Click [here](#) to view the status history.

Thank you for submitting your request to Verify via CDX.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Wed 1/2/2013 8:21:46 PM  
**Subject:** RE: VW Group Model Year 2014 SCR / AECD Approval Request for 3.0L TDI test group EADXJ03.04UG  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
**Ex. 7** [@arb.ca.gov](mailto:@arb.ca.gov)  
[@arb.ca.gov](mailto:@arb.ca.gov)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Thanks Jim,

I will follow up with Len when he returns Monday about commonality for the EGR protection.

Regards,

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, January 02, 2013 2:04 PM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group Model Year 2014 SCR / AECD Approval Request for 3.0L TDI test group EADXJ03.04UG

Mike, I approved the AECD. I did notice a EGR protection listed (page 12) that I hadn't seen before. We have heard of this before but I don't recall seeing it in previous VW/Audi AECDs. Is this the only engine with it or do the others have it too?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, [REDACTED] Ex. 7 @arb.ca.gov>, Linc Wehrly/AA/USEPA/US@EPA  
Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>, "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 12/18/2012 02:57 PM  
Subject: VW Group Model Year 2014 SCR / AECD Approval Request for 3.0L TDI test group EADXJ03.04UG

Hello Jim, Linc and [REDACTED] Ex. 7

Today we submitted a request for approval for SCR / AECD for our Model Year 14 3.0L TDI test group EADXJ03.04UG. This request is contained in a (single) PDF document including cover letter and supporting pages, submitted under the following names:

EPA VERIFY: CBI\_EADXJ03.04UG\_RFA\_SCR\_R00  
ARB DMS: CBI\_VOLK\_CORRESP\_RFA1SCR\_.PDF (see workflow  
2014\_CBI\_VOLK\_CORRESP\_RFA1SCR\_)

This MY 14 test group is based on the same engine used in current test groups for Q7 / Touareg but will now include several PC models (A6,A7,A8, A8L) as well as one light truck (Q5).

In addition, this test group will be amongst our first for MY14 certification, therefore we would kindly ask you to review this at your earliest convenience. Please contact me if you have any questions about this request.

Regards,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/7/2013 2:31:07 PM  
**Subject:** RE: Telephone Message regarding EPA's Verify database requirements for CARB LEV3 diesel fuel

Len,

Thanks for your email and Happy New Year to you also.

The part of the message that was cut off, I asked two questions, e.g.:

My understanding is that CARB LEV 3 regulations revised the diesel fuel specs for 2015 and subsequent model years---which would require a new fuel code in Verify for CARB LEV3 diesel fuel.

My questions are 1) whether you agree with my reading of CARB LEV3 diesel fuel requirements, and 2) what test fuel VW intends to use for 2014 and later diesel vehicles. [Normally, CARB LEV3 requirements start in 2015 model year, but optionally manufacturers may meet LEV3 requirements in 2014 model year.]

Dave

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: David Good/AA/USEPA/US@EPA  
Date: 01/07/2013 08:31 AM  
Subject: RE: Telephone Message

Hello Dave:

I heard part of your telephone message regarding diesel fuel, but the system cut it short due to length. My understanding is that you believe that the diesel fuel spec in the ARB LEV III regulations does not comply with the EPA diesel fuel spec. I assume you mean test fuel. You asked if we agree that this is the case, and then the message was cut off. I guess that the rest of the question might be what the implications are for Tier 3 or if we would have some suggestions on how to address this situation. I will discuss this internally and we will respond to the initial question. Please let me know what additional information you may want. A short e-mail would be good, since our telephone message system appears to have some limitations.

Best regards and Happy New Year!

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204

Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 1/11/2013 8:19:27 PM  
**Subject:** Re: 2013 Beetle Convertible automatic Fuel Economy  
[winmail.dat](#)

Richard,

If you need to label a vehicle prior to Monday morning (when Verify comes back up) you can send us the label notification, a vehicle description, the fuel economy mpg values, etc in short letter to EPA.

Dave

From: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA, "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
Date: 01/10/2013 08:55 AM  
Subject: 2013 Beetle Convertible automatic Fuel Economy

Hello Jim;

I spoke with Dave Good earlier this week, regarding the fuel economy labeling for the Beetle Convertible TDI automatic, he asked me to additionally contact you. As you know the replacement fuel economy data vehicle for the Beetle Convertible TDI automatic, will be confirmed at your facility in March 2013. Unfortunately, it comes late with regard to the port release of this model as several orders have been sold but not delivered. This Beetle Convertible TDI automatic model is on hold, pending the fuel economy label.

We wish to label this model with the new data vehicle and Wolfsburg results. If required, after confirmatory testing has been completed and a relabel is required because of lower EPA test results, we will complete a relabel in March. We will offer a voluntary lower highway result for this vehicle model type, I do not think a relabel will be necessary.

Dave did not seem to have any concerns, but you were involved with the discussions on this model, so I request that if you see any difficulties with this plan, please let me know. Is there any way we can use a voluntary lower specific fuel economy label prior to the Verify system coming back on line on January 14th?

Best regards,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213

Fax: 248 754-4207

Richard.Thomas@VW.com<mailto:Richard.Thomas@VW.com>

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael (EEO)"  
**Sent:** Fri 1/11/2013 8:33:02 PM  
**Subject:** RE: VW Group Model Year 2014 SCR / AECD Approval Request for 3.0L TDI test group EADXJ03.04UG  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
**Ex. 7** [@arb.ca.gov](mailto:@arb.ca.gov)  
[@arb.ca.gov](mailto:@arb.ca.gov)  
[Leonard.Kata@vw.com](mailto:Leonard.Kata@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

We asked the factory, and the reply is that the EGR protection is present since MY 2011. To verify, I our the applications and the page 12 info that you referenced shows up starting with MY11 (for 3.0L TDI only).

Regards

Mike

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, January 02, 2013 2:04 PM  
To: Giles, Michael (EEO)  
Subject: Re: VW Group Model Year 2014 SCR / AECD Approval Request for 3.0L TDI test group EADXJ03.04UG

Mike, I approved the AECD. I did notice a EGR protection listed (page 12) that I hadn't seen before. We have heard of this before but I don't recall seeing in it previous VW/Audi AECDs. Is this the only engine with it or do the others have it too?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>



To: Jim Snyder/AA/USEPA/US@EPA, [Ex. 7]@arb.ca.gov, Linc Wehrly/AA/USEPA/US@EPA  
Cc: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>, "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 12/18/2012 02:57 PM  
Subject: VW Group Model Year 2014 SCR / AECD Approval Request for 3.0L TDI test group EADXJ03.04UG

Hello Jim, Linc and [Ex. 7]

Today we submitted a request for approval for SCR / AECD for our Model Year 14 3.0L TDI test group EADXJ03.04UG. This request is contained in a (single) PDF document including cover letter and supporting pages, submitted under the following names:

EPA VERIFY: CBI\_EADXJ03.04UG\_RFA\_SCR\_R00  
ARB DMS: CBI\_VOLK\_CORRESP\_RFA1SCR\_.PDF (see workflow  
2014\_CBI\_VOLK\_CORRESP\_RFA1SCR\_)

This MY 14 test group is based on the same engine used in current test groups for Q7 / Touareg but will now include several PC models (A6,A7,A8, A8L) as well as one light truck (Q5).

In addition, this test group will be amongst our first for MY14 certification, therefore we would kindly ask you to review this at your earliest convenience. Please contact me if you have any questions about this request.

Regards,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** leonard.kata@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;oliver.schmidt@vw.com[];  
liver.schmidt@vw.com[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/22/2013 2:37:58 PM  
**Subject:** Electric Vehicle templates attached  
[2013 generic EV Label calculations-1-18-13.xlsm](#)  
[EV Verify Rel 9and10-Charge Depleting example data.8-9-2012.pdf](#)  
[PHEV - Verify Rel9-Charge Depleting example data-2-10-2011.pdf](#)

Len,

In the VW/EPA meeting on 10/30/2012, you asked if we could send you an EV and a PHEV calculator template.

Attached is an EV calculator---sorry it took so long for me to respond, but I needed 2-3 hours to clean it up a bit (and I didn't find the time until last Friday). The template calculates derived 5-cycle label values and "Capped" label values (which are capped at a maximum 30% downward in-use adjustment factor)---per EPA policy for EVs. The template seemed to work OK for one EV manufacturer----let me know if you see any errors or have any questions.

I have a PHEV calculator that worked well for Fisker (non blended PHEV), but still need to clean it up a little. I'll try to send it to you this morning or so.

Also attached are example templates for entering charge depleting data into EPA's Verify data base.

Please call if you have questions.

Dave

## Example - Charge Depleting Data for an Electric Vehicle

U.S. Environmental Protection Agency  
Verify: Engine and Vehicle Compliance System

Welcome, David Good. Today is Monday, November 28, 2011 (ET)

VERIFY Intranet Home

[Home](#) > [Light Duty Vehicle & Truck](#) > [Search for Test Information](#) > [Test Information Search Results](#) > [Test Information Details](#)[Back](#) [Help](#) [Logout](#)

## Test Information Details

Record Number:

&lt;&lt; &lt; &gt; &gt;&gt;

of 0

Search

Search Results

Test Information EPA Tab

## General Information

Process Code	Correction Submission	Mfr Code	MTX - Mitsubishi Motors Corporation
Test Number	CMTX10016275	Exhaust Evap Test Number Link	
Vehicle ID / Configuration	EB12-EM21 / 0	Test Date	2011-06-15

## EPA Only Fields

Dataset Status	Active	Submission Date	11/21/2011
Test Category	Charge Depleting	LOD Test Number	
EPA Dyno Number		Test 5-Cycle Category	Not 5-Cycle

## Test Particulars

Test Procedure	81 - Charge Depleting UDDS	Test Fuel Type	62 - Electricity
Verify Test Lab ID	1	Odometer Units	M
Test Start Odometer Reading	300	4WD Test Dyno	No
State of Charge Delta Indicator	No	Fuel Batch ID	MOKZEV
Fuel Batch Mfr Code	MTX	Diesel Adjustment Factor	Downward
Fuel Batch Calibration Number	1101	Usage	
Retest Indicator	No	Refest Reason	N/A
Verify Test Number That Was Retested		Manufacturer Confirmatory Test?	No
Original Manufacturer Verify Test Number That Was Confirmed			

## Analytically-Derived FE / CREE

Analytically Derived?	No	ADFE Base Verify Test Number	
ADFE Total Road Load Horsepower	N/A	ADFE ETW	N/A
ADFE N/V Ratio	N/A		

## PHEV/Charge Depleting Test Information

Recharge Event Voltage	240	Recharge Event Energy (kiloWatt-hours)	18.3012
Charge Depleting Range (Calculated miles)	97.935	Charge Depleting Range (Actual miles)	97.935
Equivalent All Electric Range (miles)	97.935	Number of Charge Depleting Bags / Phases Conducted	1
Fuel Economy Value Units	miles per gallon		

## Test Results

UDDS/Highway/US06 Bag/Phase Number 1

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	97.935	-
AMP-HRS ( Integrated Amp-hours )	0	-
AS-VOLT ( Average System Voltage )	0	-
CO ( Carbon Monoxide )	0	-
CO2 ( Carbon dioxide )	0	-
CREE ( Carbon-Related Exhaust Emissions )	0	-
END-SOC ( System End State of Charge )	0	-

Amp <del>Wait</del> (hours)			
HC-TOTAL ( Total Hydrocarbon )	0		
MFR FE ( Manufacturer Fuel Economy )	180.4		180.4
NOX ( Nitrogen Oxide )	0		
START-SOC ( System Start State of Charge )	0		
Amp <del>Wait</del> (hours)			

Note: Verify doesn't perform this calculation. Verify currently defaults to the mfr's value

Verify-Calculated Fields

System Miles 289

Fuel Economy

Unrounded Unadjusted Fuel Economy	--	Rounded Unadjusted Fuel Economy	--
Unrounded Adjusted Fuel Economy	--	Rounded Adjusted Fuel Economy	--

CREE / OPT-CREE

Unrounded Unadjusted CREE	--	Rounded Unadjusted CREE	--
Unrounded Adjusted CREE	--	Rounded Adjusted CREE	--
Unrounded Unadjusted OPT-CREE	--	Rounded Unadjusted OPT-CREE	--
Unrounded Adjusted OPT-CREE	--	Rounded Adjusted OPT-CREE	--

Manufacturer Test Comments

This is official EPA confirmatory data. (Temporarily, inputted by Mfr.) UDDS AER(mile):97.935 , AC Energy(kWh/100mile):18.6705

[View Related Confirmatory Test Decision Information](#)

[EPA@Work Home](#) | [EPA Home](#) | [Accessibility](#)

URL: <https://verify-as1.nvfe1-pmn1.epa.gov:8080/verify-web/cft/ld/testInfo/UpdateRetrieve.do?>

$$\text{MFR FE} = \frac{33.705 \left( \frac{\text{kW-hr}}{\text{gal}} \right) \times \text{charge depleting range (miles)}}{\text{Recharge Event Energy (kW-hr)}}$$

ASTM Round to tenths  
(units are MPGe)



# U.S. Environmental Protection Agency

## Verify: Engine and Vehicle Compliance System

VERIFY Intranet Home

[Home](#) > [Light-Duty Vehicle & Truck](#) > Fuel Properties Details

Welcome, David Good. Today is Monday, November 28, 2011 (ET)

[Back](#) [Help](#) [Logout](#)

### Fuel Properties Details

Record Number:

&lt; 1 of 0 &gt;

Search

Search Results

#### General Information

Mfr Code	MTX	Fuel Batch Id	MOKZEV
Submission Date	11/20/2011	Test Fuel Type	62 - Electricity
Fuel Calibration Number	1101	Fuel Batch Calibration Ineffective Date	
Fuel Batch Calibration Effective Date	2011-05-23	Carbon Weight Fraction HC	
Fuel Batch Calibration Date	2011-03-01	Fuel Density	
Carbon Weight Fraction NMHC		Fuel Net Heating Value	
Exhaust Carbon Weight Fraction		Weight Fraction CO2	
Fuel Methanol Volume Fraction			
Fuel Specific Gravity			
Fuel Blend Carbon Weight Fraction			

[View Related Test Datasets](#)[EPA@Work Home](#) | [EPA Home](#) | [Accessibility](#)URL: <https://verify-as1.nvfel-pmn1.epa.gov:8080/verify-web/cft/ld/fuelPropUpdateRetrieve.do...>

Example - Charge Depleting Data for a PHEV

U.S. Environmental Protection Agency

## Verify: Engine and Vehicle Compliance System

Welcome, David Good. Today is Tuesday, February 07, 2012 (ET)

VERIFY Intranet Home

Home &gt; Light-Duty Vehicle &amp; Truck &gt; Search for Test Information &gt; Test Information Search Results &gt; Test Information Details

Back Help Logout

## Test Information Details

Record Number:

&lt;&lt; 1 &gt;&gt;

of 1

Search

Search Results

Test Information EPA Tab

## General Information

Process Code	Correction Submission	Mfr Code	GMX - General Motors LLC
Test Number	CGMX10017746	Exhaust Evap Test Number Link	
Vehicle ID / Configuration	141DRN4804 / 1	Test Date	2011-11-04

## EPA Only Fields

Dataset Status	Active	Submission Date	01/04/2012
Test Category	Charge Depleting	LOD Test Number	
EPA Dyno Number		Test 5-Cycle Category	Not 5-Cycle

## Test Particulars

Test Procedure	81 - Charge Depleting UDDS	Test Fuel Type	62 - Electricity
Verify Test Lab ID		Odometer Units	M
Test Start Odometer Reading	5038	4WD Test Dyno	No
State of Charge Delta Indicator	Yes		
Fuel Batch Mfr Code		Fuel Batch ID	
Fuel Batch Calibration Number		Diesel Adjustment Factor	Downward
		Usage	
Retest Indicator	No	Retest Reason	N/A
Verify Test Number That Was Retested		Manufacturer Confirmatory Test?	No
Original Manufacturer Verify-Test Number That Was Confirmed			

## Analytically-Derived FE / CREE

Analytically Derived?	No	ADFE Base Verify Test Number	
ADFE Total Road Load Horsepower	N/A	ADFE ETW	N/A
ADFE N/V Ratio	N/A		

## PHEV/Charge Depleting Test Information

Recharge Event Voltage	249	Recharge Event Energy (kiloWatt-hours)	13.819
Charge Depleting Range (Calculated miles)	56.48	Charge Depleting Range (Actual miles)	56.48
Equivalent All Electric Range (miles)	55.88	Number of Charge Depleting Bags / Phases Conducted	9
Fuel Economy Value Units	miles per gallon		

## Test Results

UDDS/Highway/US06 Bag/Phase Number 1

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	7.439	-
AMP-HRS ( Integrated Amp-hours )	3.953	-
AS-VOLT ( Average System Voltage )	384.77	-
CO ( Carbon Monoxide )	0	-
CO2 ( Carbon dioxide )	0	-
CREE ( Carbon-Related Exhaust Emissions )	0	-
END-SOC ( System End State of Charge (Amp hours) )	3.953	-
FE BAG 1 ( Bag 1 Fuel Economy )	0	0
FE BAG 2 ( Bag 2 Fuel Economy )	0	0

Please enter Reda (calculated range to the calculated transition point in 2 places) per SAE J1711 page 47-48

Please enter CARB value

cumulative

Please enter CO<sub>2</sub> CREE & MFR FE in Phase 1 for the entire charge depleting test sequence (up to the transition point where the vehicle becomes charge sustaining)

Please be sure to enter units of mpg.

Should be zero for series PHEVs, but not zero for parallel (blended) hybrids

see note on page 2

$$\text{MFR FE} = 33.705 (\text{kw-hr/gal}) \times \text{Charge Depleting Range (miles)}$$

Recharge Event Energy (kw-hr)

ASTM rounded to tenths  
(units are MPGe)

See note on page 1 - please enter MFR FE in Phase 1 for the entire test sequence

Please include FE Bag 1 and FE Bag 2 for all phases, where:

• FE Bag 1 = the gasoline-only fuel economy for each phase

• FE Bag 2 = 0 (needed for a business rule)

HC-NM ( Non-methane Hydrocarbon )	0	-
HC-TOTAL ( Total Hydrocarbon )	0	-
METHANE ( CH4 - Methane )	0	-
MFR FE ( Manufacturer Fuel Economy )	137.8	137.8
NMOG ( Non-methane organic gas (California) )	0	-
NOX ( Nitrogen Oxide )	0	-
START-SOC ( System Start State of Charge )	0	-
Amp Wait-hours	-	-

UDDS/Highway/US06 Bag/Phase Number 2

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	7.453	-
AMP-HRS ( Integrated Amp-hours )	7.809	-
AS-VOLT ( Average System Voltage )	378.24	-
CO ( Carbon Monoxide )	0	-
END-SOC ( System End State of Charge )	7.809	-
Amp Wait-hours	-	-
FE BAG 1 ( Bag 1 Fuel Economy )	0	0
FE BAG 2 ( Bag 2 Fuel Economy )	0	0
HC-NM ( Non-methane Hydrocarbon )	0	-
HC-TOTAL ( Total Hydrocarbon )	0	-
METHANE ( CH4 - Methane )	0	-
MFR FE ( Manufacturer Fuel Economy )	0	0
NMOG ( Non-methane organic gas (California) )	0	-
NOX ( Nitrogen Oxide )	0	-
START-SOC ( System Start State of Charge )	3.953	-
Amp Wait-hours	-	-

UDDS/Highway/US06 Bag/Phase Number 3

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	7.464	-
AMP-HRS ( Integrated Amp-hours )	11.73	-
AS-VOLT ( Average System Voltage )	372.04	-
CO ( Carbon Monoxide )	0	-
END-SOC ( System End State of Charge )	11.73	-
Amp Wait-hours	-	-
FE BAG 1 ( Bag 1 Fuel Economy )	0	0
FE BAG 2 ( Bag 2 Fuel Economy )	0	0
HC-NM ( Non-methane Hydrocarbon )	0	-
HC-TOTAL ( Total Hydrocarbon )	0	-
METHANE ( CH4 - Methane )	0	-
MFR FE ( Manufacturer Fuel Economy )	0	0
NMOG ( Non-methane organic gas (California) )	0	-
NOX ( Nitrogen Oxide )	0	-
START-SOC ( System Start State of Charge )	7.809	-
Amp Wait-hours	-	-

UDDS/Highway/US06 Bag/Phase Number 4

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	7.466	-
AMP-HRS ( Integrated Amp-hours )	15.69	-
AS-VOLT ( Average System Voltage )	385.29	-
CO ( Carbon Monoxide )	0	-
END-SOC ( System End State of Charge )	15.69	-
Amp Wait-hours	-	-
FE BAG 1 ( Bag 1 Fuel Economy )	0	0
FE BAG 2 ( Bag 2 Fuel Economy )	0	0
HC-NM ( Non-methane Hydrocarbon )	0	-
HC-TOTAL ( Total Hydrocarbon )	0	-
METHANE ( CH4 - Methane )	0	-
MFR FE ( Manufacturer Fuel Economy )	0	0
NMOG ( Non-methane organic gas (California) )	0	-
NOX ( Nitrogen Oxide )	0	-

Note: Verify doesn't perform this calculation. Verify currently defaults to mfr's value.

Should be zero for series PHEVs until the transition phase. For parallel (blended) PHEVs, please enter the emissions & FE Bag 1 data for each phase.

START-SOC ( System Start State of Charge )	11.73	--
<i>Amp</i> <del>Wait</del> -hours )		

UDDS/Highway/US06 Bag/Phase Number 5

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	7.461	--
AMP-HRS ( Integrated Amp-hours )	19.71	--
AS-VOLT ( Average System Voltage )	359.27	--
CO ( Carbon Monoxide )	0	--
END-SOC ( System End State of Charge )	19.71	--
<i>Amp</i> <del>Wait</del> -hours )		
FE BAG 1 ( Bag 1 Fuel Economy )	0	0
FE BAG 2 ( Bag 2 Fuel Economy )	0	0
HC-NM ( Non-methane Hydrocarbon )	0	--
HC-TOTAL ( Total Hydrocarbon )	0	--
METHANE ( CH4 - Methane )	0	--
MFR FE ( Manufacturer Fuel Economy )	0	0
NMOG ( Non-methane organic gas (California) )	0	--
NOX ( Nitrogen Oxide )	0	--
START-SOC ( System Start State of Charge )	15.69	--
<i>Amp</i> <del>Wait</del> -hours )		

UDDS/Highway/US06 Bag/Phase Number 6

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	7.455	--
AMP-HRS ( Integrated Amp-hours )	23.8	--
AS-VOLT ( Average System Voltage )	353.28	--
CO ( Carbon Monoxide )	0	--
END-SOC ( System End State of Charge )	23.8	--
<i>Amp</i> <del>Wait</del> -hours )		
FE BAG 1 ( Bag 1 Fuel Economy )	0	0
FE BAG 2 ( Bag 2 Fuel Economy )	0	0
HC-NM ( Non-methane Hydrocarbon )	0	--
HC-TOTAL ( Total Hydrocarbon )	0	--
METHANE ( CH4 - Methane )	0	--
MFR FE ( Manufacturer Fuel Economy )	0	0
NMOG ( Non-methane organic gas (California) )	0	--
NOX ( Nitrogen Oxide )	0	--
START-SOC ( System Start State of Charge )	19.71	--
<i>Amp</i> <del>Wait</del> -hours )		

UDDS/Highway/US06 Bag/Phase Number 7

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	7.452	--
AMP-HRS ( Integrated Amp-hours )	27.92	--
AS-VOLT ( Average System Voltage )	347.83	--
CO ( Carbon Monoxide )	0	--
END-SOC ( System End State of Charge )	27.92	--
<i>Amp</i> <del>Wait</del> -hours )		
FE BAG 1 ( Bag 1 Fuel Economy )	0	0
FE BAG 2 ( Bag 2 Fuel Economy )	0	0
HC-NM ( Non-methane Hydrocarbon )	0	--
HC-TOTAL ( Total Hydrocarbon )	0	--
METHANE ( CH4 - Methane )	0	--
MFR FE ( Manufacturer Fuel Economy )	0	0
NMOG ( Non-methane organic gas (California) )	0	--
NOX ( Nitrogen Oxide )	0	--
START-SOC ( System Start State of Charge )	23.8	--
<i>Amp</i> <del>Wait</del> -hours )		

UDDS/Highway/US06 Bag/Phase Number 8

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value

Cumulative

Cumulative

Cumulative



Cumulative

ACT-DISTANCE ( Actual Distance Driven (miles) )	7.458	--
AMP-HRS ( Integrated Amp-hours )	30.29	--
AS-VOLT ( Average System Voltage )	343.39	--
CO ( Carbon Monoxide )	0.644	--
END-SOC ( System End State of Charge ( Amp-hrs ) )	30.29	--
FE BAG 1 ( Bag 1 Fuel Economy )	96.4	96.4
FE BAG 2 ( Bag 2 Fuel Economy )	0	0
HC-NM ( Non-methane Hydrocarbon )	0.009	--
HC-TOTAL ( Total Hydrocarbon )	0.012	--
METHANE ( CH4 - Methane )	0.003	--
MFR FE ( Manufacturer Fuel Economy )	0	0
NMOG ( Non-methane organic gas (California) )	0.0094	--
NOX ( Nitrogen Oxide )	0.013	--
START-SOC ( System Start State of Charge ( Amp-hrs ) )	27.92	--

UDDS/Highway/US06 Bag/Phase Number 9

Cumulative

Test Result Name	Unrounded Test	Verify-Calculated Fuel Economy Mile Per Gallon Equivalent Value
ACT-DISTANCE ( Actual Distance Driven (miles) )	7.454	--
AMP-HRS ( Integrated Amp-hours )	30.36	--
AS-VOLT ( Average System Voltage )	341.28	--
CO ( Carbon Monoxide )	1.001	--
END-SOC ( System End State of Charge ( Amp-hrs ) )	30.36	--
FE BAG 1 ( Bag 1 Fuel Economy )	51	51
FE BAG 2 ( Bag 2 Fuel Economy )	0	0
HC-NM ( Non-methane Hydrocarbon )	0.004	--
HC-TOTAL ( Total Hydrocarbon )	0.007	--
METHANE ( CH4 - Methane )	0.003	--
MFR FE ( Manufacturer Fuel Economy )	0	0
NMOG ( Non-methane organic gas (California) )	0.0042	--
NOX ( Nitrogen Oxide )	0.016	--
START-SOC ( System Start State of Charge ( Amp-hrs ) )	30.2	--

## Verify-Calculated Fields

System Miles 5038

## Fuel Economy

Unrounded Unadjusted Fuel Economy	--	Rounded Unadjusted Fuel Economy	--
Unrounded Adjusted Fuel Economy	--	Rounded Adjusted Fuel Economy	--

## CREE / OPT-CREE

Unrounded Unadjusted CREE	--	Rounded Unadjusted CREE	--
Unrounded Adjusted CREE	--	Rounded Adjusted CREE	--
Unrounded Unadjusted OPT-CREE	--	Rounded Unadjusted OPT-CREE	--
Unrounded Adjusted OPT-CREE	--	Rounded Adjusted OPT-CREE	--

## Manufacturer Test Comments

150K CD EMIS TEST

View Related Confirmatory Test Decision Information

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/22/2013 5:21:39 PM  
**Subject:** re: 2014 FE Guide - Errors in EPA's data base as of January 17, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VW Group 2014 FE Guide-all rel dates-no-sales-1-17-2013.xlsx](#)

Richard,

Our macro picked up a few errors in your 2014 labels. Attached are the data in Verify as of January 17, 2013 for 2014 model year FE labels. Labels with pea green fill in the first few columns contained errors and were not sent to DOE for posting on the web (provided the label release date was Jan 22, 2013 or earlier).

I'll run my next query of the 2014 FE Label data on Feb 1, 2013---for posting on the web a few days later.

Please make any needed corrections when you get a chance.

Thanks

**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/29/2013 10:13:41 PM  
**Subject:** re: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before 2/1/2013 if possible  
[VW Group 2013 FE Guide new labels-all rel dates-no-sales-1-25-2013.xlsx](#)  
[VW Group 2014 FE Guide-all rel dates-no-sales-1-25-2013.xlsx](#)

Richard,

re: 2013 FE Guide - Errors in Verify as of 1/27/2013 which need correcting before 2/1/2013 if possible

Our macro picked up some errors in your 2013 Labels. If possible please correct them before 2/1/2013--- so I can send the data to DOE for posting on the web (for the Feb 1st posting).

Sorry about the late notice. I'll also include the 2014 Labels FYI--they looked OK to me.

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 1/31/2013 2:05:16 PM  
**Subject:** RE: VW wants to use a common mfr code for VW Group  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Hi Jim;

Thanks for the note and voice mail. Can you track down Bob Peavyhouse sometime and ask if he will be able to handle the changes and what, if anything, we (the EEO) can do to assist. If you could explain that this scenario was approved by the upper management of the Volkswagen Group and now we need to make the modifications because the factory is beginning to create Group test groups names. They will use the new Group code "VGA" for 2015 model year. The brands under this new code would be; ADX, VWX, BEX, NLX and BGT for Audi, Volkswagen, Bentley, Lamborghini and Bugatti respectively.

Thanks,

Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

From: [Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov) [mailto:[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)]  
Sent: Wednesday, January 30, 2013 4:33 PM  
To: Thomas, Richard (EEO)  
Subject: VW wants to use a common mfr code for VW Group

Richard, I left you a voice mail but this is probably better. I reviewed Volkswagen Group's proposal to have a common Mfr code with separate manufacturer names on the VECI labels. I checked with our lawyer regarding the reg language and there's no issue with accepting this. We all think its okay so I don't think we need a meeting to discuss this.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Fri 2/1/2013 11:05:24 AM  
**Subject:** RE: VW wants to use a common mfr code for VW Group  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[mailto:Snyder.Jim@epamail.epa.gov](mailto:mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Great, thanks.

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, January 31, 2013 4:43 PM  
To: Thomas, Richard (EEO)  
Subject: RE: VW wants to use a common mfr code for VW Group

I talked to Bob beforehand and supported it. I think he looks forward to this simplifying calculations. I'll ask him if there is anything else needed to be done.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Thomas, Richard (EEO)" <[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 01/31/2013 09:06 AM  
Subject: RE: VW wants to use a common mfr code for VW Group

Hi Jim;

Thanks for the note and voice mail. Can you track down Bob Peavyhouse sometime and ask if he will be able to handle the changes and what, if anything, we (the EEO) can do to assist. If you could explain that this scenario was approved by the upper management of the Volkswagen Group and now we need to make the modifications because the factory is beginning to create Group test groups names. They will use the new Group code "VGA" for 2015 model year. The brands under this new code would be; ADX, VWX, BEX, NLX and BGT for Audi, Volkswagen, Bentley, Lamborghini and Bugatti respectively.

Thanks,  
Richard

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
Richard.Thomas@VW.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, January 30, 2013 4:33 PM  
To: Thomas, Richard (EEO)  
Subject: VW wants to use a common mfr code for VW Group

Richard, I left you a voice mail but this is probably better. I reviewed Volkswagen Group's proposal to have a common Mfr code with separate manufacturer names on the VECI labels. I checked with our lawyer regarding the reg language and there's no issue with accepting this. We all think its okay so I don't think we need a meeting to discuss this.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**Cc:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Roberts French/OU=AA/O=USEPA/C=US@EPA[]; N=Roberts French/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 2/8/2013 5:06:44 PM  
**Subject:** Re: VW/EPA Certification Meeting October 29, 2012  
[00 Agenda EPA Cert-Test.pptx](#)  
[01 Start Stop Survey.pptx](#)  
[02 FFV.pptx](#)  
[03 AWC.pptx](#)  
[04 BEV EPA.pptx](#)  
[05 BEVx 2012 EPA.ppt](#)  
[06 SAE 1634 EPA.pptx](#)  
[07 PHEV.pptx](#)  
[08 Energy assist EPA.pptx](#)  
[VW EPA Cert Meeting Oct 29,2012.pdf](#)  
[2014 generic EV Label calculations-1-18-13.xlsm](#)

Len,

Thanks for checking with us (and the reminder). Here are my comments:

1. Item 2 (FFV usage factor) - My notes from that meeting indicate that EPA had quite a few concerns about Item 2---the proposed method of performing a survey of your 2016 and later model year FFVs to determine the in-use ethanol (E85) usage factor, ref. 40 CFR 600.510-12(k). We were concerned about the counting method for your algorithm. It seemed to count any fuel which the ethanol sensor determines is above E20 as if the vehicle were refueled for that refueling event or tankful or those miles(??) as if the vehicle were refueled with E85 (in the spring, summer & fall) or E70-85 (in the winter).

Your minutes seem OK. Your minutes read as follows: "EPA reaction to the VW proposal: 1. May need a more sophisticated algorithm (to account for residual fuel). 2. Need a nationwide rather than regional calculation. VW will present an updated proposal for determination of the usage factor for the next meeting. EPA wants to see more refinement regarding the ethanol content/sensor (Slide 4)."

Please include Rob French and me (for GHG purposes) when you present your updated proposal. Note that EPA intends to provide in the next month or so the 2016 ethanol (E85) usage factor discussed in 40 CFR 600.510-12(k)(1). I think it will be via a Federal Register notice.

2. Item 3 (2017 Audi Q7 PHEV with optional wireless charging system) - I'd like to send a description of this system to NHTSA as soon as possible for their advice on how to classify the vehicle (car or truck) for CAFE purposes. Hopefully EPA and NHTSA will agree on how to classify the vehicle for CAFE and GHG purposes.

Please send us a detailed description of how the ride height of the vehicle is controlled, e.g. how the customer can control ride height, how the vehicle computer controls ride height (including parameters sensed and parameters controlled). In addition, please describe how the optional wireless charging system influences the ride height & ride height controls. For example, please provide a description of the system similar to what will eventually go in the owners manual (plus any other instructions you intend to provide to the customer).

Also, please send us the five measurements for all the various possible ride height positions----including various driver-controlled ride height positions and and ride height positions which are automatically



controlled (similar to your first slide and similar to the information you provided for your 2001 Audi A6 Quattro). Please provide the ride height for vehicles with and without the optional wireless charging system. [Measurements include approach angle, breakover angle, departure angle, running clearance (in inches and cm), axle clearance(in inches and cm).]

3. Item 9 Audi Energy Assist and GHG Off-Cycle Credits - We had quite a few questions about this system, and couldn't see how to objectively determine the credits. So far, we haven't discussed this item within our GHG team members. To get the issue moving, I'd recommend that you send us a letter outlining the details of how the system works, how you would propose to quantify any potential credits, where in the 2017 GHG rule this system is discussed (if it is), plus any other relevant information.

4, BEV PHEV calculators - I emailed you the attached BEV calculator a couple weeks ago (the attached spreadsheet is renamed it to 2014). Was this what you were looking for? For the PHEV calculator, I have one for a non-blended PHEV. Do you want a calculator for a non-blended or blended PHEV?

I'll defer to Jim and Chris on the other items in your minutes, plus any additional comments they may have on these two items.

Dave

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA  
Date: 02/06/2013 12:00 AM  
Subject: VW/EPA Certification Meeting October 29, 2012

Hello Jim, Dave, and Chris:

I know that some time has passed since we met in October 2012, but I would appreciate it if you would take a look at the meeting report and provide any comments or feedback. Other EPA staff participated as well and may wish to contribute their comments.

I have attached all of the slides from our meeting, for ready reference. The report is the last attachment. Please let me know if this should go into VERIFY.

Since the report indicates some follow-up on the part of VW and EPA, we would appreciate an opportunity to have a telephone conference/webinar to discuss the open points.

Best regards,

Len

---

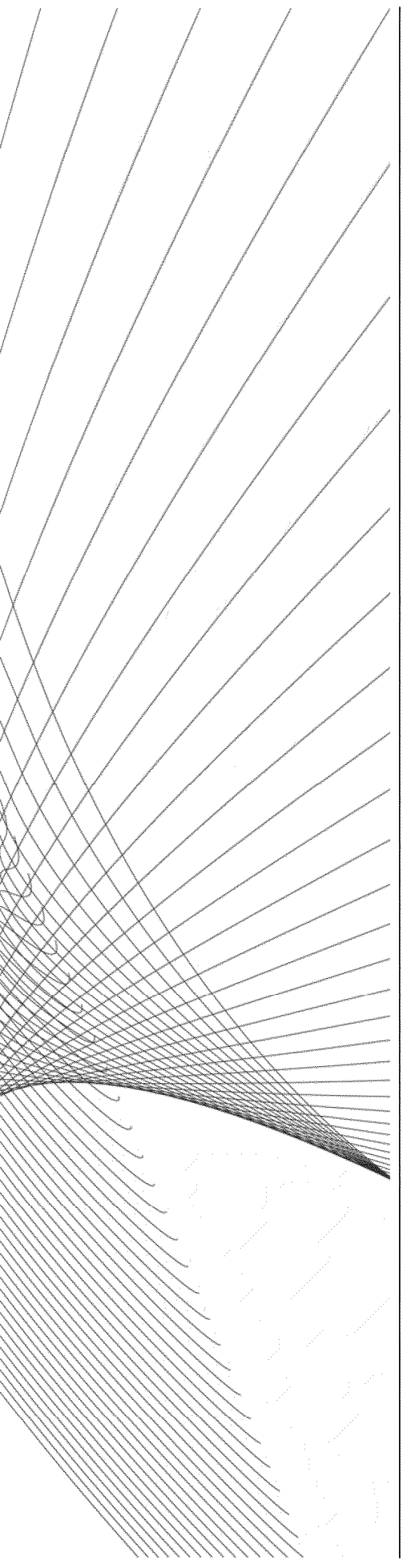
Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.

Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

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**EPA Meeting**  
**October 29th , 2012**



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## **Agenda EPA – VWGoA Meeting**

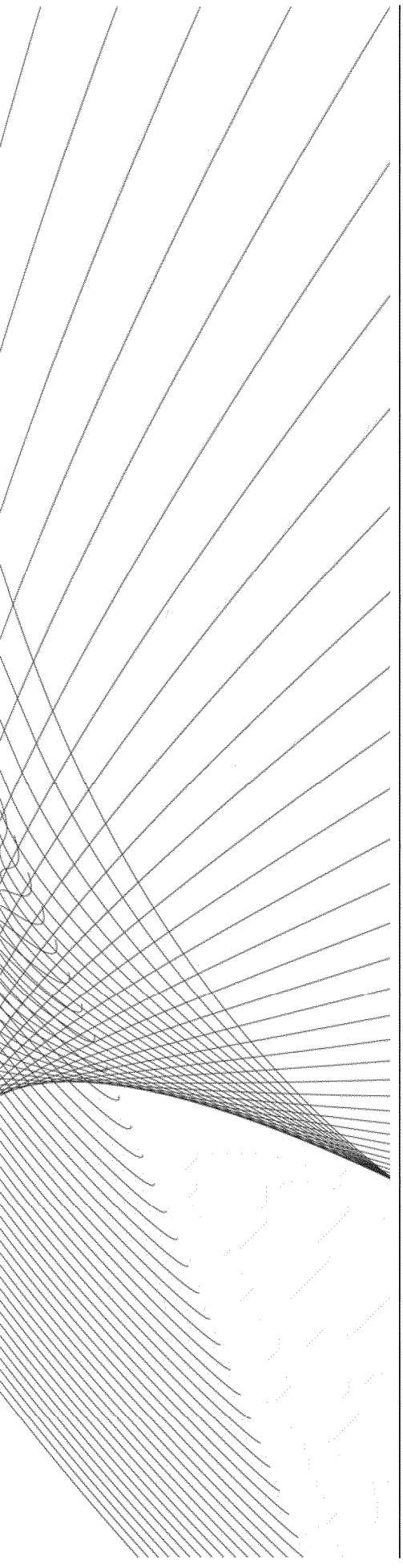
**EX. 4 - CBI**

## **Agenda EPA – VWGoA Meeting**

**EX. 4 - CBI**

## **Agenda EPA – VWGoA Meeting**

# **EX. 4 - CBI**



# Volkswagen Group of America

**EPA Meeting**

**October 29th , 2012**

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**Ex. 4 - CBI**



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**Ex. 4 - CBI**

**Ex. 4 - CBI**

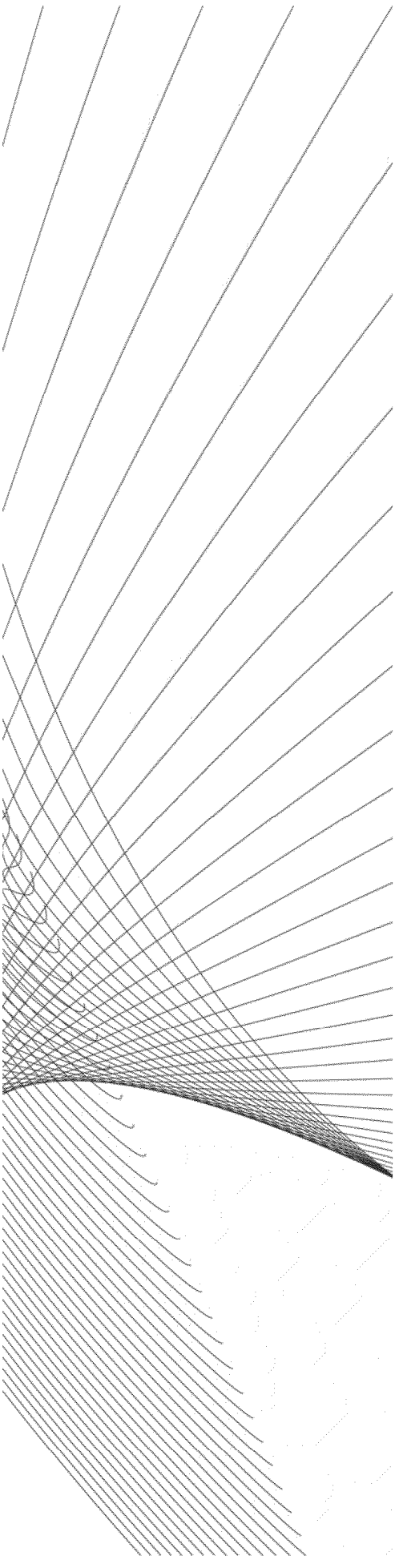
# Ex. 4 - CBI

**Ex. 4 - CBI**

**Ex. 4 - CBI**

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## **Volkswagen Group of America**

**EPA Meeting**

**Flex FuelVehicle – usage factors**

**October 29<sup>th</sup>, 2012**



# EX. 4 - CBI

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**Ex. 4 - CBI**

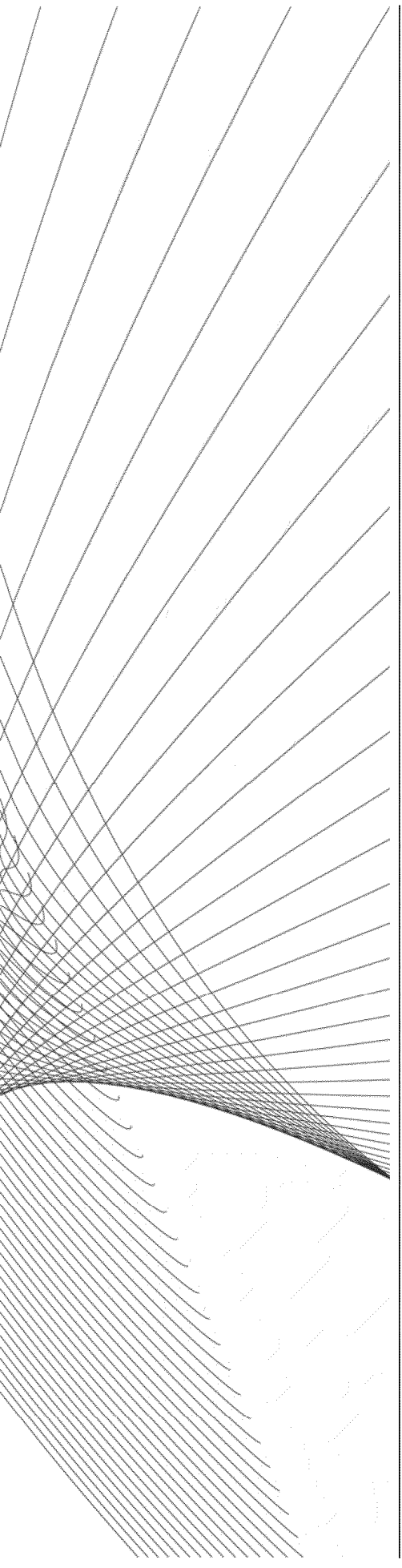
**Ex. 4 - CBI**

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**Volkswagen Group of America**

**EPA Meeting**

**October 29th , 2012**

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**Ex. 4 - CBI**

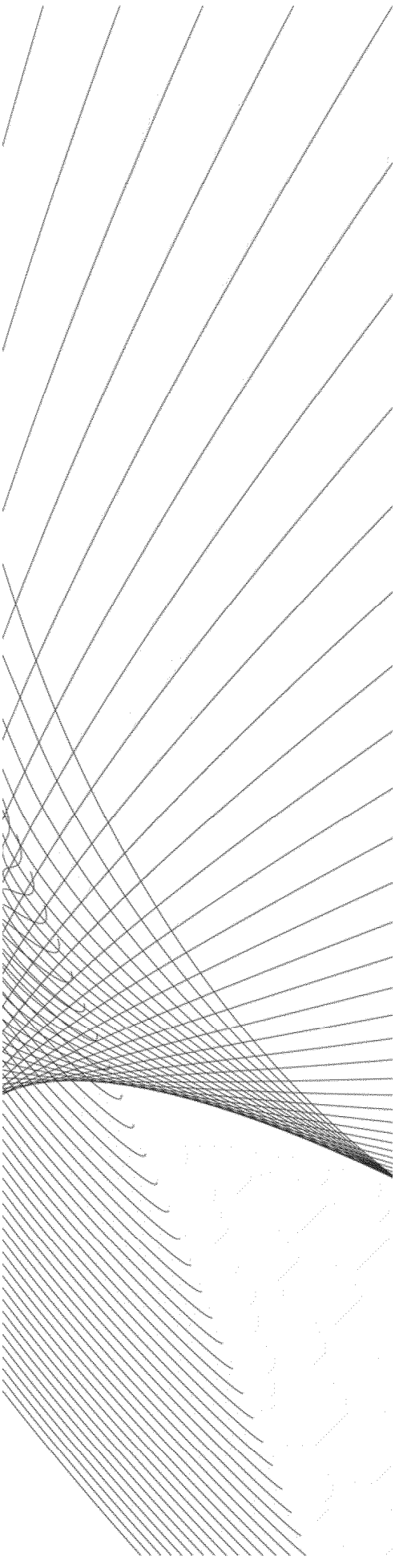
# Ex. 4 - CBI

# Ex. 4 - CBI



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**EX. 4 - CBI**



# **Volkswagen Group of America**

## **EPA Meeting**

### **Test procedure BEV**

**October 29<sup>th</sup>, 2012**

**Ex. 4 - CBI**

**Ex. 4 - CBI**

**Ex. 4 - CBI**

**Ex. 4 - CBI**

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**Ex. 4 - CBI**

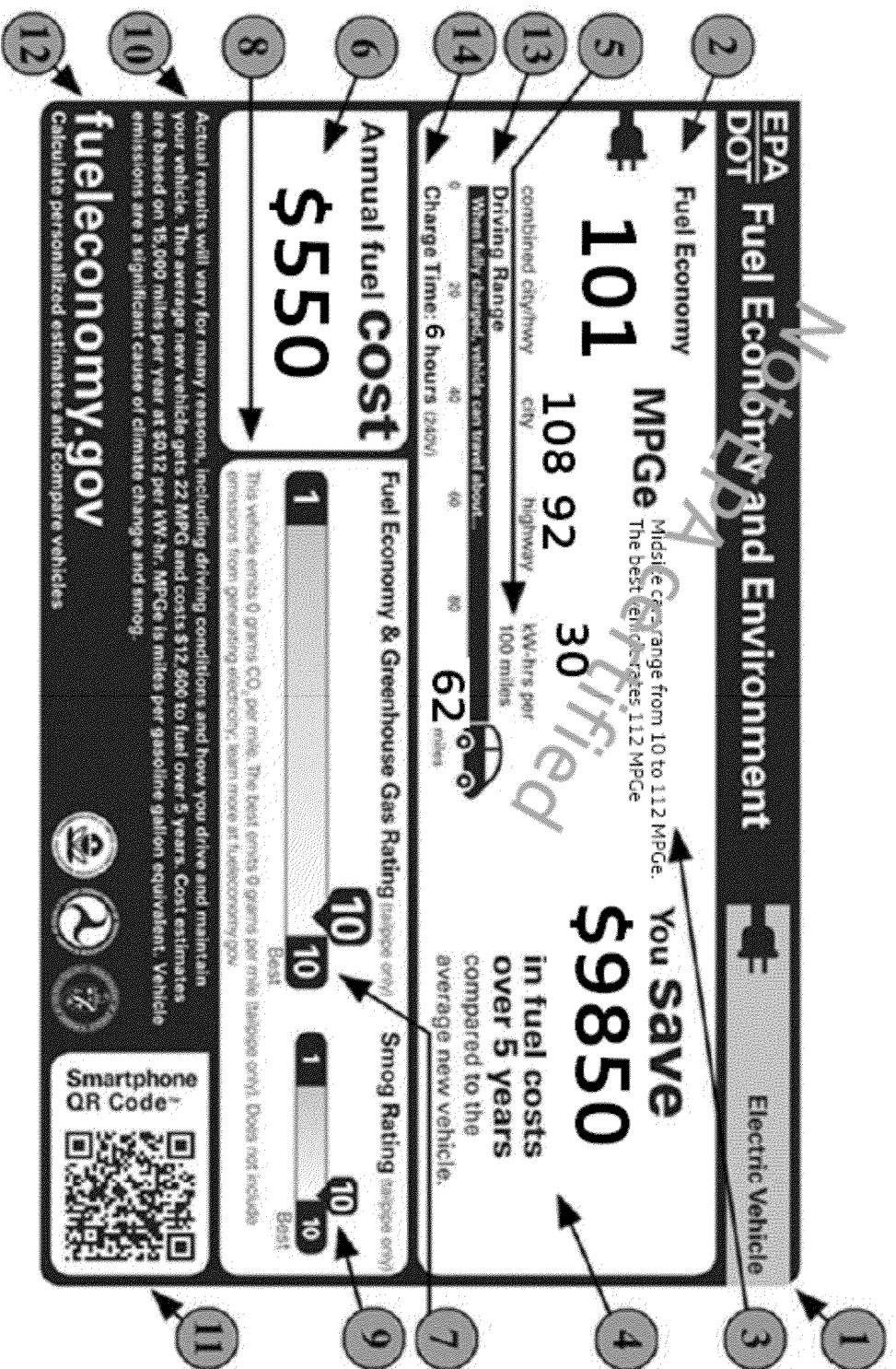
**EX. 4 - CBI**



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# Test evaluation BEV

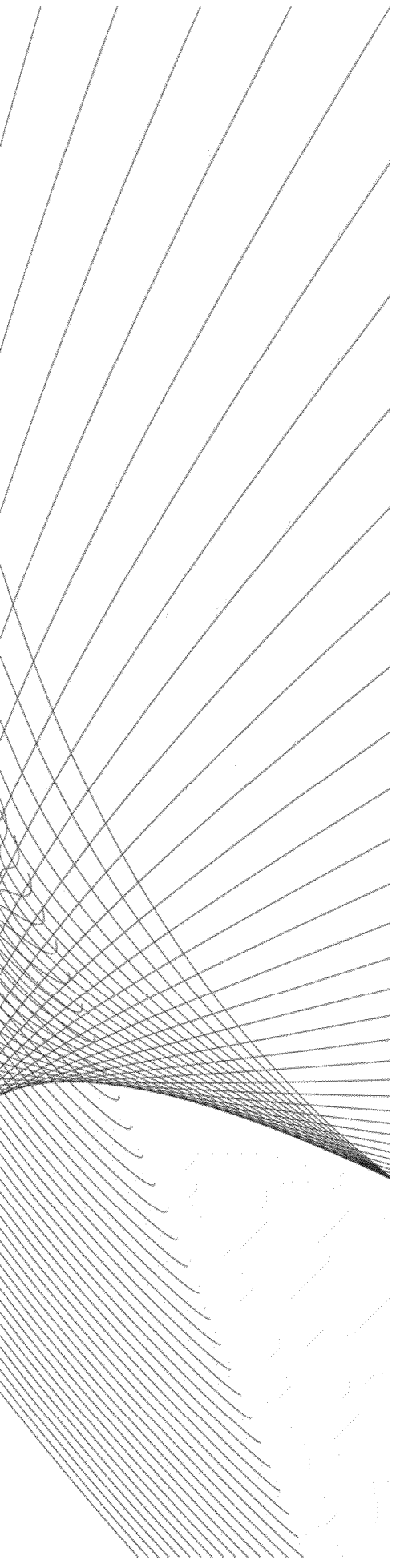
## Fuel Economy Label



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**Ex. 4 - CBI**



# **Volkswagen Group of America**

## **EPA Meeting – 29<sup>th</sup>, October 2012**

**BEVx and GHG CO2, Label and ZEV Credits**

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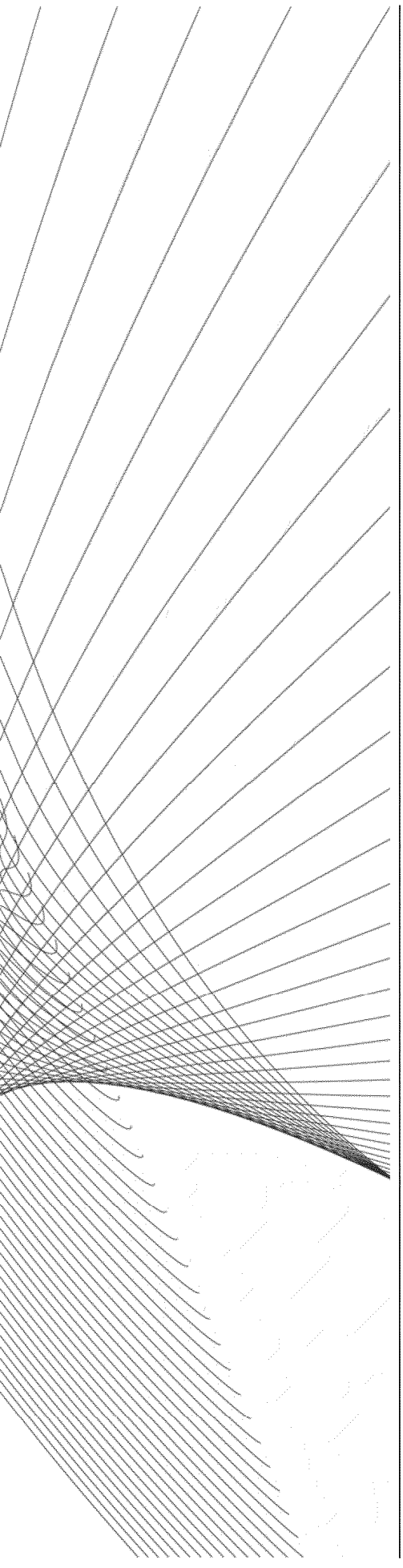
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**Ex. 4 - CBI**

# Ex. 4 - CBI

# **VOLKSWAGEN**

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## **Volkswagen Group of America**

**EPA Meeting draft agenda**  
**October 29th , 2012**

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**Ex. 4 - CBI**

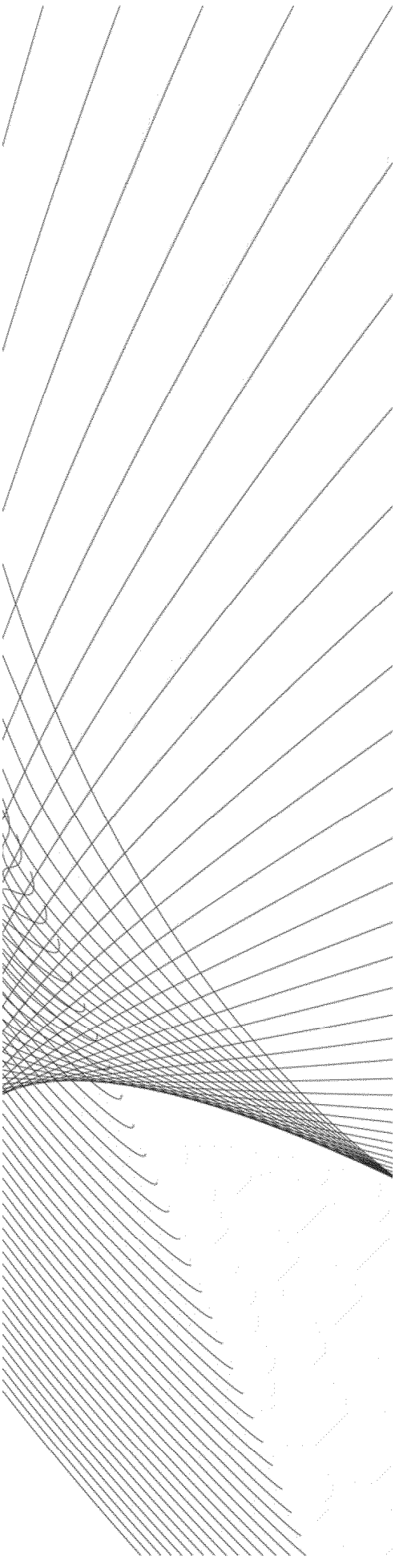
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**Ex. 4 - CBI**



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**Ex. 4 - CBI**



# **Volkswagen Group of America**

## **EPA Meeting**

### **Test procedure PHEV**

**October 29<sup>th</sup>. 2012**

**Ex. 4 - CBI**

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**Ex. 4 - CBI**

# Ex. 4 - CBI

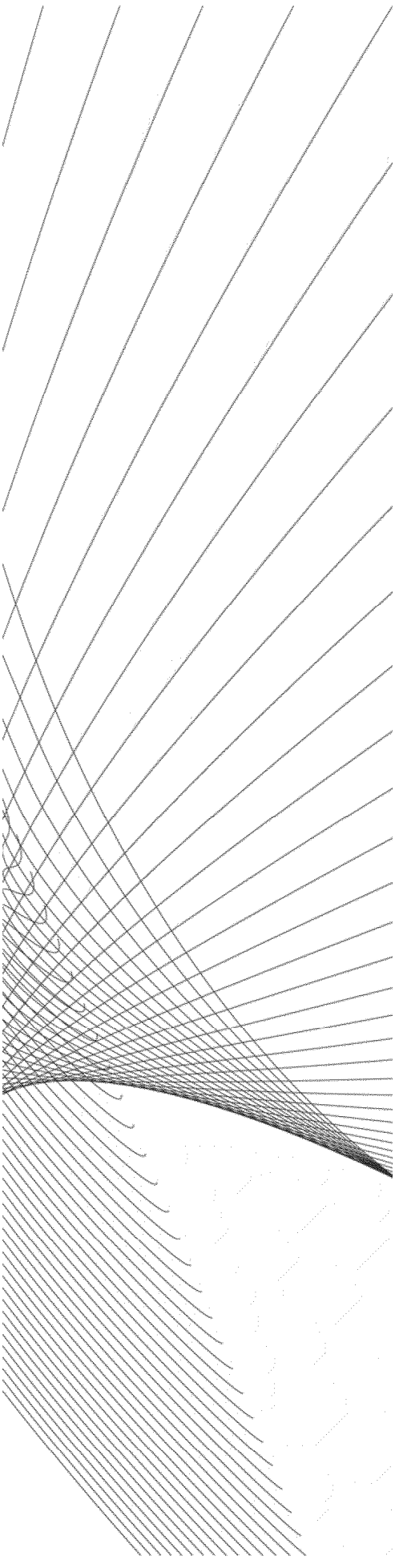
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**Ex. 4 - CBI**

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October 2012; VWG6A



# **Volkswagen Group of America**

**EPA Meeting**

**AUDI energy assist**

**October 29<sup>th</sup>, 2012**



# Ex. 4 - CBI

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**Ex. 4 - CBI**

**Ex. 4 - CBI**

<b>Report – Emission Certification Meeting</b> <b>U.S. Environmental Protection Agency</b> <b>Ann Arbor, Michigan</b> <b>October 29, 2012</b>			
<b>VW Group Participants:</b> Lothar Rech Hannah Schlueter Domenic Rist Leonard Kata Nick Tamborra Jenny Sigelko Juergen Peter (telephone)		<b>EPA Participants:</b> Dave Good Jim Snyder Chris Nevers Rob French Will Ott David Wright	
<b>Agenda Item</b>		<b>Discussion / Open Topics</b>	
<b>Topic</b>		<b>Action</b>	
		to be re	
		VW action	

**Ex. 4 - CBI**

vw action

EPA confirmation requested	EPA clarification requested	VW action
<div data-bbox="219 905 1291 1079">Ex. 4 - CBI</div>		

	<div data-bbox="256 898 1354 1066" data-label="Section-Header"> <h1>Ex. 4 - CBI</h1> </div>			EPA action	VW action	VW action	EPA confirmation requested	3
2				3				

EPA approved	VW action  EPA clarification requested for acronym.	EPA action
<div data-bbox="228 903 1256 1066" data-label="Section-Header"> <h1>Ex. 4 - CBI</h1> </div>		
	4	5

	EPA approved		EPA feedback requested
		s	
<div>Ex. 4 - CBI</div>			
6	7	8	9



**To:** richard.thomas@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Fri 2/8/2013 10:00:15 PM  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)  
[VW Group 2013 FE Guide-new labels since 1-3-2013-all rel dates-no-sales-2-5-2013.xlsx](#)

Richard,

re: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Attached are the data in Verify as of February 5, 2013 (for new model year 2013 FE labels since January 3, 2012, only). Labels with pea green fill in the first few columns were not sent to DOE on February 5, 2013 for posting on the web. Error messages are in the first column with the column where the error occurred highlighted in yellow fill, as usual.

The next normal posting of 2013 FE Label data will be on March 1, 2013 or so (on a monthly schedule where I run the query on the 1st of the month). If you need an important 2013 FE Label posted on the web before that time, please send me an email message and I'll be glad to have it posted earlier.

Please make any needed corrections when you get a chance.

Thanks

**To:** Verify@EPA[]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Mon 2/11/2013 8:09:15 PM  
**Subject:** VW Group - New Approved User  
[Tobias Glas-esa.pdf](#)  
[user-info-20130211.xls](#)

Hello,

Please see the attached forms to add a new approved user, Tobias Glas, to the Verify system and manufacturer codes VWX, ADX and BEX. We have also include a complete User information spreadsheet for the entire Volkswagen Group. Please notify me when this new user is set up and able to access the system.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.

Engineering and Environmental Office

Auburn Hills, MI

(248) 754-4219

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

# VOLKSWAGEN

GROUP OF AMERICA

Verify Team  
OAR/OTAQ/CISD  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Leonard W. Kata Name  
Manager Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

February 11, 2013 Date

Subject: CROMERR Documents

Dear Verify Team,

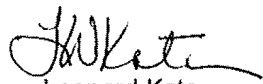
The enclosed documents are the completed CROMERR signature forms for the Verify System for the entire Volkswagen Group of America including Audi, Bentley, Bugatti, Lamborghini and Volkswagen.

Tobias Glas is a new addition to our list of approved users for Audi, Bentley and Volkswagen.

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

If you have any questions with regard to this information please contact our office in Auburn Hills at (248) 754-4219 or (248) 754-4204.

Sincerely,



Leonard Kata  
Volkswagen Group of America, Inc.

Enclosures

## Electronic Signature Agreement (ESA)

To be signed and submitted by a  
Verify Submitter

1. I agree to protect the electronic signature credential, consisting of my Central Data Exchange (CDX) user identification and password, from use by anyone except me. Specifically, I agree to maintain the secrecy of the password; I will not divulge or delegate my user name and password to any other individual; I will not store my password in an unprotected location; and I will not allow my password to be written into computer scripts to achieve automated login.
2. I agree that if I have any reason to believe that the security of my User ID or Password has been compromised I will inform U.S. EPA by calling the CDX Help Desk at 1-888-890-1995 as soon as possible, but no later than 24 hours after I learn of the problem.
3. I agree to maintain an electronic mail account; if any e-mail sent to me by U.S. EPA is returned as undeliverable, I will explain this occurrence when requested by U.S. EPA. I understand that I will be informed through this e-mail address whenever my user identification or password has been modified.
4. I understand that CDX reports the last date my user identification and password were used immediately after successfully logging into CDX.
5. I understand that whenever I electronically sign and submit an electronic document to the CDX, I will receive an e-mail message at my registered e-mail address as an "out-of-band" receipt. This e-mail message will inform me that a submission has been made to CDX from my user account and will contain instructions to view information regarding the submission in my CDX Inbox.
6. I understand that I will receive an e-mail message in my CDX inbox with a link to my encrypted, electronically signed copy of my submission as an "in-band" receipt.
7. I agree to review the acknowledgements and copies of documents that I electronically sign and submit to the US EPA's CDX.
8. I agree that if I receive an in-band or out-of-band receipt for a submission that I do not believe that I submitted, I will notify the CDX Help Desk as soon as possible, but no later than 24 hours, after receipt.
9. I agree to contact the CDX Help Desk if I do not receive a receipt either by in-band or out-of-band message within 5 business days for any electronically signed submission using my credentials.
10. I agree to report, within 24 hours of discovery, any evidence of a discrepancy between an electronic document I have signed and submitted and what the CDX has received from me by contacting the CDX Help Desk.
11. I agree to notify U.S. EPA if I cease to represent the regulated entity specified below, by sending an e-mail message to [verify@epa.gov](mailto:verify@epa.gov) with "Verify Account Termination" in the subject line.
12. I agree that I will be held legally bound, obligated, and responsible for any submittal made through my user account using the Verify System, as though I were making such a submittal in hardcopy form with my handwritten signature as certification.
13. I agree to retain a copy of this signed agreement as long as I continue to represent the regulated entity specified above as signatory of the company's electronic submissions.

Signature: \_\_\_\_\_

**Ex. 6**

Printed Name: Tobias Glas

Title: EEO - In Use Emissions Compliance Specialist

Company: Volkswagen Group of America, Inc.

Address: 3800 Hamlin Road

City, State, Zip: Auburn Hills, MI, 48326

E-mail Address: tobias.glas@vw.com

Telephone Number: 248-754-4211 Date: Feb. 11, 2013

CDX User ID: \_\_\_\_\_

**Ex. 6**

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9. I agree to contact the CDX Help Desk if I do not receive a receipt either by in-band or out-of-band message within 5 business days for any electronically signed submission using my credentials.
10. I agree to report, within 24 hours of discovery, any evidence of a discrepancy between an electronic document I have signed and submitted and what the CDX has received from me by contacting the CDX Help Desk.
11. I agree to notify U.S. EPA if I cease to represent the regulated entity specified below, by sending an e-mail message to [verify@epa.gov](mailto:verify@epa.gov) with "Verify Account Termination" in the subject line.
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**Ex. 6**

Signature: \_\_\_\_\_

Printed Name: Tobias Glas

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Company: Volkswagen Group of America, Inc.

Address: 3800 Hamlin Road

City, State, Zip: Auburn Hills, MI, 48326

E-mail Address: tobias.glas@vw.com

Telephone Number: 248-754-4211 Date: Feb. 11, 2013

CDX User ID: **Ex. 6** \_\_\_\_\_

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Company: Volkswagen Group of America, Inc.

Address: 3800 Hamlin Road

City, State, Zip: Auburn Hills, MI, 48326

E-mail Address: tobias.glas@vw.com

Telephone Number: 248-754-4211 Date: Feb. 11, 2013

CDX User ID: **Ex. 6** \_\_\_\_\_

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;Verify@EPA[]; erify@EPA[]  
**From:** CN=Pete Petersen/OU=AA/O=USEPA/C=US  
**Sent:** Tue 2/12/2013 1:40:23 PM  
**Subject:** Re: VW Group - New Approved User  
[Tobias Glas-esa.pdf](#)  
[user-info-20130211.xls](#)

I assume you have mailed these forms to the Verify Team address? I am not allowed to accept electronic copies.

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Verify@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 02/11/2013 03:09 PM  
Subject: VW Group - New Approved User

Hello,  
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Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
william.rodgers@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]; Kata, Leonard (EEO)" [Leonard.Kata@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Glas, Tobias" [Tobias.Glas@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Tue 2/12/2013 6:06:41 PM  
**Subject:** VW Group Tests and Decision Information

Hello Jim,

As a heads up to what's coming your way, the following support an upcoming running change which adds a 208hp next-generation 2.0l TFSI engine (up from 200hp) to the existing Bin 3 test group DVWXV02.03PA.

- Today I submitted two sets of Tests and Decision Information for Beetle Convertible and Beetle Coupe models as FEDV's in the test group.
- Tomorrow I hope to submit the same for Jetta GLI, also as an FEDV for the test group.

Later in the week, I expect to establish a new Federal-only Bin 5 test group and submit tests for the same basic engine and models. The Beetle Convertible automatic will be the EDV for this new test group.

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 2/12/2013 8:12:35 PM  
**Subject:** RE: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Richard,

The Adventador Roadster (Index 93) was sent to DOE for posting on the web. (It was error free with a release date of 1/14/2013.) Should it have been?

Dave

**From:** "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
**To:** David Good/AA/USEPA/US@EPA  
**Cc:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 02/12/2013 08:18 AM  
**Subject:** RE: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Hi Dave;

I took care of the error for the 2013 Beetle Convertible TDI index 135, a couple days ago.

There was one other 2013 Lamborghini Aventador Roadster on the spreadsheet you sent, but there was no green shading in the first column and it had a release date of January 14, 2013. Was that sent to DOE? Was there a problem with Lamborghini index 93?

Thanks,  
Richard

**From:** Good.David@epamail.epa.gov [mailto:Good.David@epamail.epa.gov]  
**Sent:** Friday, February 08, 2013 5:00 PM  
**To:** Thomas, Richard (EEO)  
**Cc:** Snyder.Jim@epamail.epa.gov  
**Subject:** re: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Richard,

re: 2013 FE Guide - Errors in EPA's data base as of February 5, 2013 which held up posting on [www.fueleconomy.gov](http://www.fueleconomy.gov)

Attached are the data in Verify as of February 5, 2013 (for new model year 2013 FE labels since January 3, 2012, only). Labels with pea green fill in the first few columns were not sent to DOE on February 5, 2013

for posting on the web. Error messages are in the first column with the column where the error occurred highlighted in yellow fill, as usual.

The next normal posting of 2013 FE Label data will be on March 1, 2013 or so (on a monthly schedule where I run the query on the 1st of the month). If you need an important 2013 FE Label posted on the web before that time, please send me an email message and I'll be glad to have it posted earlier.

Please make any needed corrections when you get a chance.

Thanks

(See attached file: VW\_Group\_2013 FEGuide-new labels since 1-3-2013-all rel dates-no-sales-2-5-2013.xlsx)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Wed 2/13/2013 2:08:42 PM  
**Subject:** Revised 2014 Cert Preview Attachment  
MY 2014 TEST GROUPS ATTACHMENT A EEO 02062013 REVISION.xlsx

Hi Jim,

Attached is the updated chart we discussed for 2014MY.

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Glas, Tobias" [Tobias.Glas@vw.com]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 2/14/2013 1:38:25 PM  
**Subject:** FW: VW Group - New Approved User  
[Tobias.Glas@vw.com](mailto:Tobias.Glas@vw.com)  
[Petersen.Pete@epamail.epa.gov](mailto:Petersen.Pete@epamail.epa.gov)  
[mailto:Petersen.Pete@epamail.epa.gov](mailto:mailto:Petersen.Pete@epamail.epa.gov)  
[Verify@epa.gov](mailto:Verify@epa.gov)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[Verify@epa.gov](mailto:Verify@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[image001.gif](#)

Jim,

Perhaps we need to submit a new form for VW? or can you adjust the user name we requested so it works with the system.

Requested user name: glastvw

Proposed change: glastvolkswagen

Regards,

Bill Rodgers

VWGoA EEO

(248) 754-4219

From: Glas, Tobias  
Sent: Thursday, February 14, 2013 7:49 AM  
To: Rodgers, William (EEO); Petersen.Pete@epamail.epa.gov  
Subject: RE: VW Group - New Approved User

Hello !

I tried to activate my Verify VW user yesterday and couldn't process it because my username only has 7 digits.

Please advise how to solve that issue.

Thank you very much !

Tobias Glas

In-Use Emission Compliance Specialist

Engineering & Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone: (248) 754-4211

Cell: (248) 494-1537

Fax: (248) 754-4207

E-Mail: Tobias.Glas@vw.com

From: Rodgers, William (EEO)

Sent: Thursday, February 14, 2013 7:31 AM

To: Glas, Tobias

Subject: FW: VW Group - New Approved User

From: Petersen.Pete@epamail.epa.gov [mailto:Petersen.Pete@epamail.epa.gov] On Behalf Of Verify@epa.gov



Sent: Tuesday, February 12, 2013 8:40 AM  
To: Rodgers, William (EEO)  
Cc: Snyder.Jim@epamail.epa.gov; Verify@epa.gov  
Subject: Re: VW Group - New Approved User

I assume you have mailed these forms to the Verify Team address? I am not allowed to accept electronic copies.

"Rodgers, William (EEO)" ---02/11/2013 03:09:31 PM---Hello, Please see the attached forms to add a new approved user, Tobias Glas, to the Verify system a

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Verify@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 02/11/2013 03:09 PM  
Subject: VW Group - New Approved User

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Regards,

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Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
william.rodgers@vw.com  
(See attached file: Tobias Glas-esa.pdf)(See attached file: user-info-20130211.xls)

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA;"Giles, Michael (EEO)" [michael.giles@vw.com];  
Giles, Michael (EEO)" [michael.giles@vw.com]  
**From:** Ex. 6  
**Sent:** Thur 2/14/2013 4:15:22 PM  
**Subject:** Re: Duplicate Inbox test waiver announcements (HLP-3629)

Hello Mr. Rodgers,

Verify Help Desk Ticket HLP-3629 was opened for your inquiry.

I've unscheduled the next scheduled notification task for this transaction id. Please let me know if you receive any additional duplicate notifications.

**Ex. 6**

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Rodgers, William  
(EEO)"  
<William.Rodgers@vw.com> To  
Verify Help Desk@CSC  
cc  
02/14/2013 08:58 ""Jim  
AM Snyder' (Snyder.Jim@epamail.epa.gov  
)"" <Snyder.Jim@epamail.epa.gov>,  
"Giles, Michael (EEO)"  
<michael.giles@vw.com>  
Subject  
Duplicate Inbox test waiver  
announcements

Hello **Ex. 6**

We are getting duplicate inbox entries for test waivers again.

The status of your submission is shown below:

Submission

Document Name: LightDutyDecisionInformationSubmission.xml

Transaction Id: \_b6be3185-4610-4bb2-b6dc-92dd72ca8801

Date Originally Submitted: 02/12/2013

Status History

Date	Status	Description
Tue 02/12/2013	Complete	Your recent Decision Information submission has been received by the EPA and you will be notified if any
12:45 PM	d	additional actions on your part are required. A Submission Processing Report and any requested dataset reports can be found on the status history page. The status history page can be reached by clicking on the link near the bottom of this Inbox message.

The following is a summary of the processing report:

Total Datasets Submitted: 1

Accepted Datasets: 1

Rejected Datasets: 0

Wed 02/13/2013	Complete	Confirmatory Test for the following Vehicle has been Waived: Manufacturer: VWX Vehicle ID: VW324 30111
3:05 PM	d	Vehicle Configuration: 0

Wed 02/13/2013	Complete	Confirmatory Test for the following Vehicle has been Waived: Manufacturer: VWX Vehicle ID: VW324 30111
4:05 PM	d	Vehicle Configuration: 0

Wed 02/13/2013	Complete	Confirmatory Test for the following Vehicle has been Waived: Manufacturer: VWX Vehicle ID: VW324 30111
5:05 PM	d	Vehicle Configuration: 0

Wed 02/13/2013	Complete	Confirmatory Test for the following Vehicle has been Waived: Manufacturer: VWX Vehicle ID: VW324 30111
6:05 PM	d	Vehicle Configuration: 0

Wed 02/13/2013	Complete	Confirmatory Test for the following Vehicle has been Waived: Manufacturer: VWX Vehicle ID: VW324 30111
7:05 PM	d	Vehicle Configuration: 0

Wed 02/13/2013	Complete	Confirmatory Test for the following Vehicle has been Waived: Manufacturer:
----------------	----------	--

VWX Vehicle ID: VW324 30111

8:05 PM d Vehicle Configuration: 0

Wed 02/13/2013 Complete Confirmatory Test for the following Vehicle has been Waived: Manufacturer:

VWX Vehicle ID: VW324 30111

9:05 PM d Vehicle Configuration: 0

Wed 02/13/2013 Complete Confirmatory Test for the following Vehicle has been Waived: Manufacturer:

VWX Vehicle ID: VW324 30111

10:05 PM d Vehicle Configuration: 0

Wed 02/13/2013 Complete Confirmatory Test for the following Vehicle has been Waived: Manufacturer:

VWX Vehicle ID: VW324 30111

11:05 PM d Vehicle Configuration: 0

Thu 02/14/2013 Complete Confirmatory Test for the following Vehicle has been Waived: Manufacturer:

VWX Vehicle ID: VW324 30111

12:05 AM d Vehicle Configuration: 0

Thu 02/14/2013 Complete Confirmatory Test for the following Vehicle has been Waived: Manufacturer:

VWX Vehicle ID: VW324 30111

1:05 AM d Vehicle Configuration: 0

Thu 02/14/2013 Complete Confirmatory Test for the following Vehicle has been Waived: Manufacturer:

VWX Vehicle ID: VW324 30111

2:05 AM d Vehicle Configuration: 0

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VWX Vehicle ID: VW324 30111

3:05 AM d Vehicle Configuration: 0

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8:06 AM d Vehicle Configuration: 0

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
william.rodgers@vw.com

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/20/2011 2:17:57 PM  
**Subject:** Audi tests and Verify

I talked to Bob. He has username for loading EPA lab data. Once its activated, he can reload the lab results today

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/17/2011 5:41:52 PM  
**Subject:** Re: VW Group Methane Deterioration Factors

Mike, I don't know why they specify separate DFs. I've tried to find out but most of the people that might know are on vacation so its taking long to get an answer this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/15/2011 10:21 AM  
Subject: VW Group Methane Deterioration Factors

Hello Jim,

As a follow up to my voice message, I was curious about the separate DF's which seem to be required for City/Highway tests, as indicated in the regulations below. Note, we are using the fleet average option. For N2O we are using the standard (0.010) so I believe no DF applies.

I would like to discuss briefly if you are available.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

---

Title 40 § 86.1823-08(m)(2)(ii) and (iii)  
2) N 2 O and CH 4. (i) For manufacturers complying with the emission standards for N2O and CH4specified

in §86.1818–12(f)(1), deterioration factors for N<sub>2</sub>O and CH<sub>4</sub> shall be determined according to the provisions of paragraphs (a) through (l) of this section.

(ii) For manufacturers complying with the fleet averaging option for N<sub>2</sub>O and CH<sub>4</sub> as allowed under §86.1818–12(f)(2), separate deterioration factors shall be determined for the FTP and HFET test cycles. Therefore each FTP test performed on the durability data vehicle selected under §86.1822–01 of this part must also be accompanied by an HFET test.

(iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N<sub>2</sub>O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NO<sub>x</sub> emissions according to the provisions of this section. For CH<sub>4</sub>, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

(3) Other carbon-related exhaust emissions. Deterioration factors shall be determined according to the provisions of paragraphs (a) through (l) of this section. Optionally, in lieu of determining emission-specific FTP and HFET deterioration factors for CH<sub>3</sub>OH (methanol), HCHO (formaldehyde), C<sub>2</sub>H<sub>5</sub>OH (ethanol), and C<sub>2</sub>H<sub>4</sub>O (acetaldehyde), manufacturers may use the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

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#### §86.1818–12(f)(2)

(f) Nitrous oxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>) exhaust emission standards for passenger automobiles and light trucks. Each manufacturer's fleet of combined passenger automobile and light trucks must comply with N<sub>2</sub>O and CH<sub>4</sub> standards using either the provisions of paragraph (f)(1) of this section or the provisions of paragraph (f)(2) of this section. The manufacturer may not use the provisions of both paragraphs (f)(1) and (f)(2) of this section in a model year. For example, a manufacturer may not use the provisions of paragraph (f)(1) of this section for their passenger automobile fleet and the provisions of paragraph (f)(2) for their light truck fleet in the same model year.

(1) Standards applicable to each test group.

(i) Exhaust emissions of nitrous oxide (N<sub>2</sub>O) shall not exceed 0.010 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

(ii) Exhaust emissions of methane (CH<sub>4</sub>) shall not exceed 0.030 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

(2) Including N<sub>2</sub>O and CH<sub>4</sub> in fleet averaging program. Manufacturers may elect to not meet the emission standards in paragraph (f)(1) of this section. Manufacturers making this election shall include N<sub>2</sub>O and CH<sub>4</sub> emissions in the determination of their fleet average carbon-related exhaust emissions, as calculated in subpart F of part 600 of this chapter. Manufacturers using this option must include both N<sub>2</sub>O and CH<sub>4</sub> full useful life values in the fleet average calculations for passenger automobiles and light trucks. Use of this option will account for N<sub>2</sub>O and CH<sub>4</sub> emissions within the carbon-related exhaust emission value determined for each model type according to the provisions part 600 of this chapter. This option requires the determination of full useful life emission values for both the Federal Test Procedure and the Highway Fuel Economy Test.

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FAX +1-248-754-4207



**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/17/2011 7:55:25 PM  
**Subject:** Fw: VW Group Methane Deterioration Factors

Mike, I talked to Tom Anderson who has been more involved with the latest rulemaking . He confirmed what you understood but also added new clarification that is included in the recent HD GHG rule.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 08/17/2011 03:51 PM -----

From: Tom Anderson/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/17/2011 03:48 PM  
Subject: Re: Fw: VW Group Methane Deterioration Factors

Jim,

First Part of the Question: - N2O DF for assigned N2O value of 0.10 g/mi.  
Mike is correct, the manufacturer can use the N2O emission standard of .010 g/mi in the optional CREE calculation and they do not have to this value (they only have to apply the N2O & CH4 DF if they use an actual measured values). See the regulation reference below:

§ 600.113 - 12 Fuel economy and carbon-related exhaust emission calculations for FTP, HFET, US06, SC03 and cold temperature FTP tests.

600.113-12 (g), (2), (iv), (C)

(iv) For manufacturers complying with the fleet averaging option for N2O and CH4 as allowed under § 86.1818– 12(f)(2) of this chapter, N2O and CH4 emission values for use in the calculation of carbon-related exhaust emissions in this section shall be the values determined according to paragraph (g)(2)(iv)(A), (B), or (C) of this section.

(iv) (C) For the 2012 through 2014 model years only, manufacturers may use an assigned value of 0.010 g/mi for N2O FTP and HFET test values. This value is not required to be adjusted by a deterioration factor.

Second Part of the Question - separate DF's which seem to be required for City/Highway tests?

Separate City and Hwy DF's are required in the current (initial GHG regulations) however, there is a change being made to this provision as part of the Heavy Duty GHG final rule (which has been signed but is not official until it is published in the federal register).

Here is the new language (which can be found in the unofficial version on the OTAQ website) for manufacturers using the optional CREE method of complying with the N2O and CH4 cap standards:

§ 86.1823-08 Durability demonstration procedures for exhaust emissions.

\* \* \* \* \*

(m) Durability demonstration procedures for vehicles subject to the greenhouse gas exhaust emission standards specified in §86.1818. ....

(m) (2) N<sub>2</sub>O and CH<sub>4</sub>. (i) For manufacturers complying with the FTP emission standards for N<sub>2</sub>O and CH<sub>4</sub> specified in §86.1818–12(f)(1) or determined under §86.1818–12 (f)(3), FTP-based deterioration factors for N<sub>2</sub>O and CH<sub>4</sub> shall be determined according to the provisions of paragraphs (a) through (l) of this section.

(ii) For manufacturers complying with the fleet averaging option for N<sub>2</sub>O and CH<sub>4</sub> as allowed under §86.1818–12(f)(2), deterioration factors based on FTP testing shall be determined and may be used to determine full useful life emissions for the FTP and HFET tests. The manufacturer may at its option determine separate deterioration factors for the FTP and HFET test cycles, in which case each FTP test performed on the durability data vehicle selected under §86.1822 of this part must also be accompanied by an HFET test.

(iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N<sub>2</sub>O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NO<sub>x</sub> emissions according to the provisions of this section. For CH<sub>4</sub>, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

Tom

From: Jim Snyder/AA/USEPA/US  
To: Tom Anderson/AA/USEPA/US@EPA  
Date: 08/17/2011 02:46 PM  
Subject: Fw: VW Group Methane Deterioration Factors

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

----- Forwarded by Jim Snyder/AA/USEPA/US on 08/17/2011 02:45 PM -----

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/15/2011 10:21 AM  
Subject: VW Group Methane Deterioration Factors

Hello Jim,

As a follow up to my voice message, I was curious about the separate DF's which seem to be required for City/Highway tests, as indicated in the regulations below. Note, we are using the fleet average option. For N<sub>2</sub>O

we are using the standard (0.010) so I believe no DF applies.

I would like to discuss briefly if you are available.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
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3800 Hamlin Road  
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---

Title 40 § 86.1823-08(m)(2)(ii) and (iii)

2) N<sub>2</sub>O and CH<sub>4</sub>. (i) For manufacturers complying with the emission standards for N<sub>2</sub>O and CH<sub>4</sub> specified in §86.1818–12(f)(1), deterioration factors for N<sub>2</sub>O and CH<sub>4</sub> shall be determined according to the provisions of paragraphs (a) through (l) of this section.

(ii) For manufacturers complying with the fleet averaging option for N<sub>2</sub>O and CH<sub>4</sub> as allowed under §86.1818–12(f)(2), separate deterioration factors shall be determined for the FTP and HFET test cycles. Therefore each FTP test performed on the durability data vehicle selected under §86.1822–01 of this part must also be accompanied by an HFET test.

(iii) For the 2012 through 2014 model years only, manufacturers may use alternative deterioration factors. For N<sub>2</sub>O, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NO<sub>x</sub> emissions according to the provisions of this section. For CH<sub>4</sub>, the alternative deterioration factor to be used to adjust FTP and HFET emissions is the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

(3) Other carbon-related exhaust emissions. Deterioration factors shall be determined according to the provisions of paragraphs (a) through (l) of this section. Optionally, in lieu of determining emission-specific FTP and HFET deterioration factors for CH<sub>3</sub>OH (methanol), HCHO (formaldehyde), C<sub>2</sub>H<sub>5</sub>OH (ethanol), and C<sub>2</sub>H<sub>4</sub>O (acetaldehyde), manufacturers may use the deterioration factor determined for NMOG or NMHC emissions according to the provisions of this section.

---

§86.1818–12(f)(2)

(f) Nitrous oxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>) exhaust emission standards for passenger automobiles and light trucks. Each manufacturer's fleet of combined passenger automobile and light trucks must comply with N<sub>2</sub>O and CH<sub>4</sub> standards using either the provisions of paragraph (f)(1) of this section or the provisions of paragraph (f)(2) of this section. The manufacturer may not use the provisions of both paragraphs (f)(1) and (f)(2) of this section in a model year. For example, a manufacturer may not use the provisions of paragraph (f)(1) of this section for their passenger automobile fleet and the provisions of paragraph (f)(2) for their light truck fleet in the same model year.

(1) Standards applicable to each test group.

(i) Exhaust emissions of nitrous oxide (N<sub>2</sub>O) shall not exceed 0.010 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

(ii) Exhaust emissions of methane (CH<sub>4</sub>) shall not exceed 0.030 grams per mile at full useful life, as measured according to the Federal Test Procedure (FTP) described in subpart B of this part.

(2) Including N<sub>2</sub>O and CH<sub>4</sub> in fleet averaging program. Manufacturers may elect to not meet the emission standards in paragraph (f)(1) of this section. Manufacturers making this election shall include N<sub>2</sub>O and CH<sub>4</sub> emissions in the determination of their fleet average carbon-related exhaust emissions, as calculated in subpart F of part 600 of this chapter. Manufacturers using this option must include both N<sub>2</sub>O and CH<sub>4</sub> full useful life values in the fleet average calculations for passenger automobiles and light trucks. Use of this option will account for N<sub>2</sub>O and CH<sub>4</sub> emissions within the carbon-related exhaust emission value determined for each model type according to the provisions part 600 of this chapter. This option requires the determination of full useful life emission values for both the Federal Test Procedure and the Highway Fuel Economy Test.

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**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Willem VandenBroek/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/18/2011 4:59:20 PM  
**Subject:** Re: VW Group - Bentley Mulsanne Application

Hi Bill, I have to leave in minutes for a doctor's appointment but I've been looking through the cert app. Looks okay so far except that the fee payment isn't in our database yet. I see by the form that it was submitted 8/10 so its probably not thru the system yet.

I'm off tomorrow but I'll leave a copy of the fee form with Bill in case they was a problem with the checking labeling .

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Giles, Michael" <michael.giles@vw.com>  
**Date:** 08/17/2011 10:56 AM  
**Subject:** VW Group - Bentley Mulsanne Application

Hello Jim,  
Just a heads up, I submitted a certification request and application for the Bentley test group CBEXV06.84LA. This is a carryover test group from 2011 with no changes. All of the Verify release 8 changes in Section 7 of the application have been satisfied with no place holders necessary. We have been delayed getting this application submitted due to OBD discussions (see Sec.16 OBD approval letter) so scheduled SOP is rather soon. Any effort you can make to prioritize this Certificate would be appreciated.

Please let me know if you have any questions.

Regards,  
Bill Rodgers  
VWGoA

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 8/29/2011 5:52:38 PM  
**Subject:** Re: FW: Decision Information - Audi Q5 Hybrid  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Bill, I see the additional FTP exhaust tests but I still don't see any evaporative test results

Jim Snyder  
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[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/29/2011 01:39 PM  
Subject: FW: Decision Information - Audi Q5 Hybrid

Jim,  
I received your call but can't seem to call out to return it.  
I added the missing 3 Evap tests you mentioned. I submitted the tests but just plain forgot to include them in the DI.

I would also like to discuss upcoming 2012 model year Application Updates with you, so when you have a minute give me a call.

Thanks,  
Bill

From: Rodgers, William  
Sent: Monday, August 29, 2011 10:16 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Cc: Giles, Michael; Hart, Robert (VWoA)  
Subject: Decision Information - Audi Q5 Hybrid

Hello Jim,  
I submitted a decision information file to Verify for the 2012 Audi Q5 (gasoline/electric) Hybrid. Note that it is an AWD configuration tested on a 4-wheel drive dyno.  
I have marked it as new technology because it's the first 4-cylinder hybrid for the VW Group and there are some hardware and software differences between the Audi hybrid and the existing VW hybrid designs. The biggest difference being that Audi uses an integral electric drive unit in the transmission, while VW uses a separate drive unit sandwiched between the engine and transmission. Please let me know if you have any further question about the vehicle.

Regards,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
william.rodgers@vw.com

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/31/2011 6:31:57 PM  
**Subject:** Re: VW Group VID-CHUB-Q5A Supplemental Information  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks, Normally I do PM but PM measurement lab is temporarily unavailable.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/31/2011 01:53 PM  
Subject: VW Group VID-CHUB-Q5A Supplemental Information

As a heads up, I uploaded the Supplemental information for the Audi Q5 Hybrid, VID: CHUB-Q5A.  
I'm not sure if you intend to measure particulate matter so I included the standards information just in case.

Regards,

Bill Rodgers  
Engineering and Environmental Office

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(248) 754-4219  
(248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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(o\\_l\_/o)



**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/13/2011 10:25:57 PM  
**Subject:** Re: VW Group - Conditional Certificate Request  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Bill, just to let you know, I've tried to approve this last week but got an error code back. I've been working with the help desk but not resolved yet. It may have something to do with the conditional. It says "N" in a box for the cert details and when I change it to "Y" for Conditional, it won't save it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 09/06/2011 10:07 AM  
**Subject:** VW Group - Conditional Certificate Request

Hello Jim,  
I submitted a Certification Request for the Audi Q5 2.0L Hybrid test group: CADXT02.0HUB. As a reminder this vehicle is scheduled for EPA testing on Nov. 2nd, therefore, we are requesting that a conditional certificate be issued.

Regards,

Bill Rodgers  
Engineering and Environmental Office

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(248) 754-4219  
(248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/13/2011 10:43:03 PM  
**Subject:** Re: VW Group - Conditional Certificate Request  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Spoke to soon. I tried something different just now and it approved it without the error message.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William" <William.Rodgers@vw.com>  
**Date:** 09/13/2011 06:25 PM  
**Subject:** Re: VW Group - Conditional Certificate Request

Bill, just to let you know, I've tried to approve this last week but got an error code back. I've been working with the help desk but not resolved yet. It may have something to do with the conditional. It says "N" in a box for the cert details and when I change it to "Y" for Conditional, it won't save it.

Jim Snyder  
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Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 09/06/2011 10:07 AM  
**Subject:** VW Group - Conditional Certificate Request

Hello Jim,  
I submitted a Certification Request for the Audi Q5 2.0L Hybrid test group: CADXT02.0HUB. As a reminder this vehicle is scheduled for EPA testing on Nov. 2nd, therefore, we are requesting that a conditional certificate be issued.

Regards,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
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(248) 754-4219  
(248) 754-4207  
william.rodgers@vw.com

/ \_ \.  
(o\\_l\_/o)

**To:** [Ex. 7]@vw.com]  
**Cc:** CN=Michael Olechiw/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 9/28/2011 5:12:03 PM  
**Subject:** Re: EPA Meetings with VW Group - September 29, 2011

[Ex. 7] I don't know what room Mike has but we'll be in N66 which has a conference phone.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Michael Olechiw/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA  
**Date:** 09/28/2011 11:46 AM  
**Subject:** EPA Meetings with VW Group - September 29, 2011

Hello Michael and Jim:

I am not sure if our meetings tomorrow morning and afternoon will be in the same room; however, is it possible to have a speaker telephone in the room(s)? There are a couple of people from the VW Group in Germany that would like to join in the meeting.

I will establish a conference call number and passcode: [Ex. 7] so the only need is a speaker phone.

We will also bring a portable projector, so no need to worry about that.

Best regards,

**Ex. 7**

**To:**

Nevers.Chris@epamail.epa.gov; [Ex. 7]@vw.com; Wehrly.Linc@epamail.epa.gov; French.Roberts@epamail.epa.gov; Spears.Matt@epamail.epa.gov[]; [Ex. 7]@vw.com; Wehrly.Linc@epamail.epa.gov; French.Roberts@epamail.epa.gov; Spears.Matt@epamail.epa.gov[]; ehrly.Linc@epamail.epa.gov; French.Roberts@epamail.epa.gov; Spears.Matt@epamail.epa.gov[]; rench.Roberts@epamail.epa.gov; Spears.Matt@epamail.epa.gov[]; pears.Matt@epamail.epa.gov[]

**Cc:**

Ball.Joel@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov[]; eineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov[]; ealy.Stephen@epamail.epa.gov; Anderson.Tom@epamail.epa.gov[]; nderson.Tom@epamail.epa.gov[]

**Bcc:**

[]

**From:** Snyder.Jim@epamail.epa.gov

**Sent:** Wed 9/28/2011 5:17:02 PM

**Subject:** Mtg with VW Audi: PHEV fuel economy, labeling and misc certification room change to N66

The VW meeting thursday afternoon has moved to N66. Matt Spears asked to trade rooms with us since they have an all day event in 126.

Jim Snyder

Light-Duty Vehicle Group

Compliance and Innovative Strategies Division

United States Environmental Protection Agency

(734) 214-4946

snyder.jim@epa.gov

**To:** Snyder.Jim@epamail.epa.gov[]

**Cc:**

Anderson.Tom@epamail.epa.gov;Ball.Joel@epamail.epa.gov;French.Roberts@epamail.epa.gov;Healy.Stephen@epamail.epa.gov;[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
all.Joel@epamail.epa.gov;French.Roberts@epamail.epa.gov;Healy.Stephen@epamail.epa.gov;[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
rench.Roberts@epamail.epa.gov;Healy.Stephen@epamail.epa.gov;[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
ealy.Stephen@epamail.epa.gov;[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
[Ex. 7]@vw.com;Nevers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
evers.Chris@epamail.epa.gov;Reineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
eineman.Martin@epamail.epa.gov;Spears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[];  
pears.Matt@epamail.epa.gov;Wehrly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[]; ehrlly.Linc@epamail.epa.gov;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[]

**Bcc:** []

**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US

**Sent:** Thur 9/29/2011 4:38:30 PM

**Subject:** Reminder: Today's VW Audi MTG IN N66 not 126

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: Snyder.Jim@epamail.epa.gov  
To: Nevers.Chris@epamail.epa.gov, [Ex. 7]@vw.com, Wehrly.Linc@epamail.epa.gov, French.Roberts@epamail.epa.gov, Spears.Matt@epamail.epa.gov  
Cc: Ball.Joel@epamail.epa.gov, Reineman.Martin@epamail.epa.gov, Healy.Stephen@epamail.epa.gov, Anderson.Tom@epamail.epa.gov  
Date: 09/28/2011 01:17 PM  
Subject: Mtg with VW Audi: PHEV fuel economy, labeling and misc certification room change to N66

The VW meeting thursday afternoon has moved to N66. Matt Spears asked to trade rooms with us since they have an all day event in 126.

Jim Snyder

Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** [Ex. 7]@vw.com]  
**Cc:** [Ex. 7]@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/20/2011 7:35:40 PM  
**Subject:** RE: EPA/Audi Meeting Report

**Ex. 7** [Ex. 7]@vw.com  
[Ex. 7]@vw.com  
[wehrly.linc@epa.gov](mailto:wehrly.linc@epa.gov)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[Healy.Stephen@epamail.epa.gov](mailto:Healy.Stephen@epamail.epa.gov)  
[Nevers.Chris@epamail.epa.gov](mailto:Nevers.Chris@epamail.epa.gov)  
[Ball.Joel@epamail.epa.gov](mailto:Ball.Joel@epamail.epa.gov)  
[Ex. 7]@vw.com

They will run the Evap test first. There is a good chance it could complete by friday if there are no problems. Its less likely that I will have the data results before monday though.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** [Ex. 7]@vw.com>  
**Date:** 10/20/2011 11:29 AM  
**Subject:** RE: EPA/Audi Meeting Report

Hello Jim,

Audi did have one other question. In order to plan the trip for the engineer who will accompany the test vehicle, Audi would like to know the order of the testing.

When the evap test will be performed may influence how long the engineer must stay here.

Based on the Wednesday test date, will the evap test be performed over the weekend or can all of the testing be accomplished by Friday?

Best regards,

[Ex. 7]

**From:** [Ex. 7]  
**Sent:** Thursday, October 20, 2011 9:31 AM  
**To:** 'Snyder.Jim@epamail.epa.gov'  
**Cc:** [Ex. 7] Healy.Stephen@epamail.epa.gov  
**Subject:** RE: EPA/Audi Meeting Report



Hello Jim:

I have been in contact with **Ex. 7** at Audi AG. The specific reason for the proposed conference call is to confirm; 1.) the understanding of the slides that were sent to you by **Ex. 7** (copy attached for extra measure!), and 2.) that the hybrid vehicle, as described, can be tested on the dynamometer at EPA.

If everything is clear and understandable, there may not be a need for the call. Audi has no further points to discuss at this time.

Please let me know if there are any open questions from your side.

Best regards,

**Ex. 7**

From: **Ex. 7**  
Sent: Wednesday, October 19, 2011 6:23 PM  
To: 'Snyder.Jim@epamail.epa.gov'  
Cc: **Ex. 7**  
Subject: RE: EPA/Audi Meeting Report

Hello Jim:

Just for information, our report from the August 19, 2010 meeting referenced in the test information for the Audi Q5 Hybrid was sent as shown below. The slides were sent in advance of the August 19, 2010 meeting.

I have requested more detail regarding the discussion topics.

Best regards,

**Ex. 7**

## **Ex. 7**

From: **Ex. 7**

Sent: Friday, September 24, 2010 8:58 AM

To: wehrly.linc@epa.gov; Snyder.Jim@epamail.epa.gov; Healy.Stephen@epamail.epa.gov;  
Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov

Subject: EPA/Audi Meeting Report

Hello all:

Attached is a copy of a report from a meeting between you and representatives of Audi AG and Volkswagen Group of America, Inc. This meeting was held on August 19, 2010.

Please note the open issues in the "Comments" section.

Best regards,

# **Ex. 7**

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/27/2011 10:05:56 PM  
**Subject:** Re: VW Group RE: Question from Lamborghini  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

See my answers in red. I will be out friday but back monday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 10/27/2011 08:49 AM  
Subject: VW Group RE: Question from Lamborghini

Jim,  
One last item for today. I am following up for Bob Hart because he is on vacation this week. Have you had the chance to look at the following questions?  
Thanks,  
Bill

From: Hart, Robert (VWoA)  
Sent: Monday, October 24, 2011 9:55 AM  
To: Jim Snyder ([Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov))  
Cc: Rodgers, William  
Subject: Question from Lamborghini

Hello Jim,

Lamborghini's first flex-fuel car is scheduled for MY 2013. They have some questions since they have no previous experience with flex-fuel vehicle confirmatory tests at the EPA.

Due to the number of possible fuel changes - between gasoline, E10 and E85 fuels, Lamborghini would like to know the order tests are performed at the EPA when a flex-fuel car is tested with evap tests included.

1) I think you told me that testing will start with whatever fuel type is in the flex-fuel vehicle when it arrives and it doesn't matter which one it is. Does it make the most sense to start with gasoline? I believe Ben Haynes in the lab has a practical preference for starting with gasoline first to minimize the E85 we have to drain and scrap.

2) Can Lamborghini request extra preconditioning between the switch from E10/E85 to gasoline to

purge the ethanol from the fuel system? Yes.

3) If evap test confirmation is included, will both gasoline and E10 tests be performed at the EPA? We currently don't Evap test with E10 but plan to in the future with the new shed. Definitely not in this round of testing if its in the next 3 months.

I will be on vacation starting tomorrow. Please Cc Bill Rodgers (William.rodgers@vw.com) on your reply.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** [Ex. 7]@vw.com]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/27/2011 10:10:34 PM  
**Subject:** Re: VW Group - Audi Q5 Hybrid Confirmatory test  
[Ex. 7]vw.com

I looked at the handout and didn't have any questions. I forwarded it to the lab and they didn't either.

My only concern is that the lab has a cell down for upgrading and scheduling may fall behind a bit. It may get pushed back a day.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>  
**Date:** 10/27/2011 08:40 AM  
**Subject:** VW Group - Audi Q5 Hybrid Confirmatory test

Jim,  
Reminder.

We are planning to deliver the Audi Q5 Hybrid, test vehicle VID: CAD-Q5A, to your facility on Monday morning around 9:30-10AM. I was in Germany last week but understand that you had correspondence with [Ex. 7] and [Ex. 7] concerning some questions about this vehicle. If there is any further follow up or questions pending, please let me know as soon as possible.

Regards,

Ex. 7

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/15/2011 1:19:27 PM  
**Subject:** Audi testing

The Audi is scheduled for a 4 bag FTP, hwy and US06 on Thursday, after the new road load derivation.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 11/17/2011 9:39:43 PM  
**Subject:** 2nd RLD of 2012 Q5 HEV  
[2012 Q5 HEV 2nd RLD.pdf](#)  
[2012 Q5 HEV 2nd RLD pg2.pdf](#)

Here's the RLD results. I circled the final set coefficients. The A and B look a lot closer to Audi's numbers. This should help correlation.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



ECDM 48M/4x4

EPA-d329  
2565 Plymouth Road  
Ann Arbor, MI 48105  
734-214-4200

**Dyno-specific data:**

Dyno No.: d329  
Dyno name: 4 WD Cell 329  
Factory number: NVFEL

Print date / time: 11/16/2011 / 13:38

Roadload derivation - Test ID: 639

**Roadload derivation:**

**Settings:**

**Ambient data:**

PL ID: 419 / 437

Date: 11/16/2011

Time: 13:23:59

Measured temperature [°F]: 74.5

Measured air pressure [psi]: 14.156

**System settings:**

Reference temperature [°F]: 68.0

Reference air pressure [psi]: 14.504

**Test settings:**

Axle mode: 4WD

Log file:

Adjustment [%]: 100.00

Max. Runs: 20

Verification: 2

**Vehicle information: Vehicle number CHUB-Q5A**

Weight [lbs]: 4750

Rot. 2WD [lbs]: 70

Rot. 4WD [lbs]: 138

Drive : 4WD

Rotational direction : Forward

Country : US

**Setting Road:**

No.	Vmax [mph]	Vmin [mph]	T-target [s]	F-target [lbf]	Error-F [lbf]
1	70.00	60.00	14.68	152.19	2.00
2	60.00	50.00	18.58	120.28	2.00
3	50.00	40.00	23.75	94.05	2.00
4	40.00	30.00	30.36	73.50	2.00
5	30.00	20.00	37.98	58.63	2.00
6	20.00	10.00	44.91	49.44	2.00


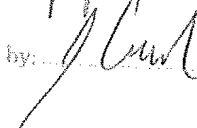
**Setting Dyno:**

**Coefficients:**

Inertia [lbs]	4750
A <sub>s</sub> [lbf]	23.16
B <sub>s</sub> [lbf/mph]	-0.0434
C <sub>s</sub> [lbf/mph <sup>2</sup> ]	0.02840

**Coefficients:**

Inertia [lbs]	4888
A <sub>t</sub> [lbf]	46.31
B <sub>t</sub> [lbf/mph]	-0.2170
C <sub>t</sub> [lbf/mph <sup>2</sup> ]	0.02840

Signed by:  Date: 11-16-11  
Verified by:  Date: 11-16-11





ECDM 48M/4x4

EPA-d329  
2565 Plymouth Road  
Ann Arbor, MI 48105  
734-214-4200

**Dyno-specific data:**

Dyno No.: d329  
Dyno name: 4 WD Cell 329  
Factory number: NVFEL

Print date / time: 11/16/2011 / 13:38

Roadload derivation - Test ID: 639

**Overview:**

Test status: Success

Run No.	Category	A [lbf]	B [lbf/mph]	C [lbf/mph <sup>2</sup> ]	v [mph]	Max. error [lbf]
CD: 1	meas	79.08	-0.0964	0.03107	69.94	*-54.28
cfm: 0	veh	55.92	-0.0530	0.00267		
	next	-9.61	-0.1640	0.02573		
CD: 2	meas	46.45	-0.2543	0.02915	69.94	-1.19
cfm: 0	veh	56.06	-0.0903	0.00342		
	next	-9.61	-0.1640	0.02573		
CD: 3	meas	46.01	-0.2490	0.02908	69.94	-0.79
cfm: 1	veh	55.62	-0.0851	0.00335		
	next	-9.61	-0.1640	0.02573		
CD: 4	meas	46.74	-0.2633	0.02920	69.94	-1.10
cfm: 2	veh	56.36	-0.0993	0.00347		
	next	-9.61	-0.1640	0.02573		

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William"  
[William.Rodgers@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 11/17/2011 10:42:22 PM  
**Subject:** Re: 2nd RLD of 2012 Q5 HEV

I spoke too soon. The new coefficients aren't really better when totalled. Hot test results are in Verify.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: "Rodgers, William" <William.Rodgers@vw.com>  
Cc: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 11/17/2011 04:39 PM  
Subject: 2nd RLD of 2012 Q5 HEV

Here's the RLD results. I circled the final set coefficients. The A and B look a lot closer to Audi's numbers. This should help correlation.

[attachment "2012 Q5 HEV 2nd RLD.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "2012 Q5 HEV 2nd RLD pg2.pdf" deleted by Jim Snyder/AA/USEPA/US]

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 11/17/2011 11:34:46 PM  
**Subject:** Re: VW Group RE: Question from Lamborghini  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

I happened to talk to Ben about E85 testing and he said he prefers flex-fuel vehicles arrive with E85 first so they don't need as much e85 fuel to do the switchover.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William" <William.Rodgers@vw.com>  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 10/27/2011 06:05 PM  
**Subject:** Re: VW Group RE: Question from Lamborghini

See my answers in red. I will be out friday but back monday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 10/27/2011 08:49 AM  
**Subject:** VW Group RE: Question from Lamborghini

Jim,  
One last item for today. I am following up for Bob Hart because he is on vacation this week. Have you had the chance to look at the following questions?  
Thanks,  
Bill

From: Hart, Robert (VWoA)  
Sent: Monday, October 24, 2011 9:55 AM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: Question from Lamborghini

Hello Jim,

Lamborghini's first flex-fuel car is scheduled for MY 2013. They have some questions since they have no previous experience with flex-fuel vehicle confirmatory tests at the EPA.

Due to the number of possible fuel changes - between gasoline, E10 and E85 fuels, Lamborghini would like to know the order tests are performed at the EPA when a flex-fuel car is tested with evap tests included.

1) I think you told me that testing will start with whatever fuel type is in the flex-fuel vehicle when it arrives and it doesn't matter which one it is. Does it make the most sense to start with gasoline? I believe Ben Haynes in the lab has a practical preference for starting with gasoline first to minimize the E85 we have to drain and scrap.

2) Can Lamborghini request extra preconditioning between the switch from E10/E85 to gasoline to purge the ethanol from the fuel system? Yes.

3) If evap test confirmation is included, will both gasoline and E10 tests be performed at the EPA? We currently don't Evap test with E10 but plan to in the future with the new shed. Definitely not in this round of testing if its in the next 3 months.

I will be on vacation starting tomorrow. Please Cc Bill Rodgers (William.rodgers@vw.com) on your reply.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 11/17/2011 11:38:32 PM  
**Subject:** CVWXV02.5259 cert

Bill, I assume this is in the cert revision to add a new carline to the certificate? The Beetle convertible is listed in the cert Application document but not in the Verify application or on the Certificate. I think one of them is incorrect.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 11/21/2011 9:57:36 PM  
**Subject:** Re: CVWXV02.5259 cert

Bill, any clarification on this test group? The Part 1 document lists the Beetle Convertible but the actual Certificate does not. I can't approve the Cert Request to revise it until they match.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William" <William.Rodgers@vw.com>  
**Date:** 11/17/2011 06:38 PM  
**Subject:** CVWXV02.5259 cert

Bill, I assume this is in the cert revision to add a new carline to the certificate? The Beetle convertible is listed in the cert Application document but not in the Verify application or on the Certificate. I think one of them is incorrect.

Jim Snyder  
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United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/22/2011 9:24:07 PM  
**Subject:** Re: Verify errors for EPA tests  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Bill I left you a voice mail but the answer to this issue is to call Bob Peavyhouse (X4814) or Karen Danzeisen (4444) and tell them you have a epa lab test that needs to be manually re-processed for CREE calculation.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 11/21/2011 05:17 PM  
**Subject:** Verify errors for EPA tests

<TransactionStatusDetails>  
    <TransactionStatusIdentifier>REJECTED</TransactionStatusIdentifier>  
    <TransactionMessageText>LD-CERT-TG-BR190 - If there exists any Official Test Number(s), then each of the Test Number(s) must be entered as an Exhaust Test Number (TG-202.5). (Test Group Fuel (TG-217.1): G)</TransactionMessageText>  
    <TransactionMessageText>LD-CERT-TG-BR189 - If the Model Year (TG-6) is greater than or equal to 2012 and if the Exhaust Test Number (TG-202.5) has a Test 5-Cycle Category (TI-45) of 'FTP75' or 'HWY', then that Exhaust Test Number (TG-202.5) must have a Rounded Adjusted CREE (TI-19.4) or Rounded Adjusted OPT-CREE (TI-19.8). The test number specified will need to be resubmitted to allow Verify to perform this calculation. (Test Number: BVWX91000667)</TransactionMessageText>  
    <TransactionMessageText>LD-CERT-TG-BR189 - If the Model Year (TG-6) is greater than or equal to 2012 and if the Exhaust Test Number (TG-202.5) has a Test 5-Cycle Category (TI-45) of 'FTP75' or 'HWY', then that Exhaust Test Number (TG-202.5) must have a Rounded Adjusted CREE (TI-19.4) or Rounded Adjusted OPT-CREE (TI-19.8). The test number specified will need to be resubmitted to allow Verify to perform this calculation. (Test Number: BVWX91000666)</TransactionMessageText>  
</TransactionStatusDetails>

Bill Rodgers  
Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States

office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com



**To:** "Rodgers, William" [William.Rodgers@vw.com]; arcos.marques@audi.com[]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/29/2011 8:50:52 PM  
**Subject:** Audi testing Wednesday

Marcos, I left you a voice but in case you don't get it. I talked to Manish the test operator, and they are testing the Audi first thing in the morning. He recommends getting here before 8:00. Tell the guard you are here for Vince Mazaitis. He gets in early.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 12/7/2011 10:56:19 PM  
**Subject:** Fw: VW Group- EPA test re-processing  
[Ex. 7]  
(embedded image)

[Ex. 7] we have an issue with the test groups that Bob Peavyhouse re-submitted test data for. You need to re-process these test groups so that the data appears in the CSI. Read Karen's note for a better explanation.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 12/07/2011 05:46 PM -----

**From:** Karen Danzeisen/AA/USEPA/US  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** Robert Peavyhouse/AA/USEPA/US@EPA  
**Date:** 12/06/2011 06:57 PM  
**Subject:** Re: Fw: VW Group- EPA test re-processing

Hi Jim,

As we discussed earlier today, I recently discovered that when [Ex. 7] reprocessed the EPA tests in order to get CREE calculations working we lost the cert levels and standards for each testgroup for which the test has been used. What we didn't realize was that when EPA staff performs a correction to an EPA test the Testgroup does \*not\* automatically get reprocessed as it does when a manufacturer submits a correction to their own tests. Therefore, we need to request VW to reprocess all the applicable testgroups shown in the chart next to the tests which we modified:

In total there are 11 unique testgroups that need reprocessing. If you were to look at a CSI Report for any of these testgroups right now you would see that the standards/cert levels section are blank for the tests corresponding tests. I'm pretty sure this is an exhaustive list for VW, but if there are any other times that you recall where LOD may have submitted a correction to a test after the most recent version of the testgroup, then there might be a similar problem with it.

Please note that the manufacturer will need to unlock the test in the Cert Request module before attempting to reprocess the Testgroups. Hopefully they have saved the most recent XML for each testgroup so that all they would need to do is change the process code from New to Correction (if necessary). Once they've reviewed the CSI reports after the testgroups have been reprocessed and confirmed that the tests once again have standards and cert levels they should go back to the Cert Request module and lock all the testgroups.

Let me know if you have any questions or would like me to work with the VW staff. Also, a couple of these tests are used for Porsche tests so I don't know if they are also processed by VW staff or if we need to contact Porsche as well.

Karen

---

Karen E. Danzeisen  
Information Technology Specialist  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency  
(734)214-4444      danzeisen.karen@epa.gov

Check out EPA's Green Vehicle Guide at "[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)"

From: Robert Peavyhouse/AA/USEPA/US  
To: Karen Danzeisen/AA/USEPA/US@EPA  
Date: 12/06/2011 01:09 PM  
Subject: Fw: VW Group- EPA test re-processing

----- Forwarded by Robert Peavyhouse/AA/USEPA/US on 12/06/2011 01:08 PM -----

From: [Ex. 7]@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, <vcoleman2@csc.com>, [Ex. 7]@vw.com>, "Giles, Michael" <michael.giles@vw.com>, [Ex. 7]@vw.com>  
Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello [Ex. 7]

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

BVWX91000666  
BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679  
BBEX91000680

BBEX91000783  
BBEX91000758

Regards,



**Ex. 7**

MFR_NM	MFR_CD	Modified	Verify TEST_NUMBER	Applicable Testgroup	Needing Reprocessing
Audi	ADX	CADX91000951		CADXV02.53UK	
Audi	ADX	CADX91000966		CADXT03.03UG	
Audi	ADX	CADX91000967		CADXT03.03UG	
Audi	ADX	CADX91000988		CADXV02.53UK	
Bentley Motors Ltd.	BEX	BBEX91000679		BBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000679		CBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000680		BBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000680		CBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000758		CBEXV06.84LA	
Bentley Motors Ltd.	BEX	BBEX91000783		CBEXV06.84LA	
Volkswagen	VWX	BVWX91000820		BPRXT03.0CHD	
Volkswagen	VWX	BVWX91000820		BVWXT03.0HEV	
Volkswagen	VWX	BVWX91000820		CPRXT03.0CHD	
Volkswagen	VWX	BVWX91000820		CVWXT03.0HEV	
Volkswagen	VWX	BVWX91000820		DPRXT03.0CHD	
Volkswagen	VWX	BVWX91000842		BPRXT03.0CHD	
Volkswagen	VWX	BVWX91000842		BVWXT03.0HEV	
Volkswagen	VWX	BVWX91000842		CPRXT03.0CHD	
Volkswagen	VWX	BVWX91000842		CVWXT03.0HEV	
Volkswagen	VWX	BVWX91000842		DPRXT03.0CHD	
Volkswagen	VWX	CVWX91000960		CVWXT02.0U4S	
Volkswagen	VWX	CVWX91000985		CVWXT02.0U4S	

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 12/8/2011 2:25:56 PM  
**Subject:** Fw: VW Group- EPA test re-processing  
[Ex. 7]  
(embedded image)  
(embedded image)

[Ex. 7] Karen found another Test group to re-process.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 12/08/2011 09:24 AM -----

From: Karen Danzeisen/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/07/2011 07:12 PM  
Subject: Fw: VW Group- EPA test re-processing

Hi Jim,

Just after you left I checked over a new and improved query result that I came up with this afternoon and found that I left off testgroup CVWXV02.5259 from the original list (see attached) for tests BVWX91000666 and BVWX91000667. Here is the new list including that change. Everything else remains the same.

Ideally VW could reprocess by Monday so that I could begin processing a complete update for the Green Vehicle Guide. It would be helpful to know if that's possible. If they have all the XML files for these testgroups and the available time, then it should be possible.

Thanks,

Karen

---

Karen E. Danzeisen  
Information Technology Specialist  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency  
(734)214-4444 danzeisen.karen@epa.gov

Check out EPA's Green Vehicle Guide at "www.epa.gov/greenvehicles"

----- Forwarded by Karen Danzeisen/AA/USEPA/US on 12/07/2011 07:01 PM -----

From: Karen Danzeisen/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Robert Peavyhouse/AA/USEPA/US@EPA  
Date: 12/06/2011 06:57 PM  
Subject: Re: Fw: VW Group- EPA test re-processing

Hi Jim,

As we discussed earlier today, I recently discovered that when Bob reprocessed the EPA tests in order to get CREE calculations working we lost the cert levels and standards for each testgroup for which the test has been used. What we didn't realize was that when EPA staff performs a correction to an EPA test the Testgroup does \*not\* automatically get reprocessed as it does when a manufacturer submits a correction to their own tests. Therefore, we need to request VW to reprocess all the applicable testgroups shown in the chart next to the tests which we modified:

In total there are 11 unique testgroups that need reprocessing. If you were to look at a CSI Report for any of these testgroups right now you would see that the standards/cert levels section are blank for the tests corresponding tests. I'm pretty sure this is an exhaustive list for VW, but if there are any other times that you recall where LOD may have submitted a correction to a test after the most recent version of the testgroup, then there might be a similar problem with it.

Please note that the manufacturer will need to unlock the test in the Cert Request module before attempting to reprocess the Testgroups. Hopefully they have saved the most recent XML for each testgroup so that all they would need to do is change the process code from New to Correction (if necessary). Once they've reviewed the CSI reports after the testgroups have been reprocessed and confirmed that the tests once again have standards and cert levels they should go back to the Cert Request module and lock all the testgroups.

Let me know if you have any questions or would like me to work with the VW staff. Also, a couple of these tests are used for Porsche tests so I don't know if they are also processed by VW staff or if we need to contact Porsche as well.

Karen

---

Karen E. Danzeisen  
Information Technology Specialist  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency  
(734)214-4444      danzeisen.karen@epa.gov

Check out EPA's Green Vehicle Guide at "[www.epa.gov/greenvehicles](http://www.epa.gov/greenvehicles)"

From: Robert Peavyhouse/AA/USEPA/US

To: Karen Danzeisen/AA/USEPA/US@EPA  
Date: 12/06/2011 01:09 PM  
Subject: Fw: VW Group- EPA test re-processing

----- Forwarded by Robert Peavyhouse/AA/USEPA/US on 12/06/2011 01:08 PM -----

From: [Ex. 7]@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA, <vcoleman2@csc.com>, [Ex. 7]@vw.com>, "Giles, Michael" <michael.giles@vw.com>, [Ex. 7]@vw.com>  
Date: 11/23/2011 08:33 AM  
Subject: VW Group- EPA test re-processing

Hello [Ex. 7]

We have been referred to you by Jim Snyder to help resolve a problem with certifying model year 2012 and carryover 2013 test groups. In order to correct the problem we are requesting that you to re-process the follow EPA confirmatory FTP and Hwy tests to include CREE and OPT-CREE calculated results in Verify. The two tests underlined below are of immediate importance and are holding up current certification.

BVWX91000666  
BVWX91000667

BVWX91000842  
BVWX91000820

9VWX09009736  
9VWX09009737

CVWX91000985  
CVWX91000960

CADX91000966  
CADX91000967

CADX91000988  
CADX91000951

BBEX91000679  
BBEX91000680

BBEX91000783  
BBEX91000758

Regards,

**Ex. 7**



**Ex. 7**

MFR_CD	VERIFY_TEST_NUM	TEST SUBMIT DT	TG SUBMIT DT	TESTGROUP_TO_REPROCESS
ADX	CADX91000951	11/28/2011 8:52:31	7/8/2011	CADXV02.53UK
ADX	CADX91000966	11/28/2011 8:54:19	7/7/2011	CADXT03.03UG
ADX	CADX91000967	11/28/2011 8:51:05	7/7/2011	CADXT03.03UG
ADX	CADX91000988	11/28/2011 8:49:54	7/8/2011	CADXV02.53UK
BEX	BBEX91000679	11/23/2011 14:33:13	9/7/2011	CBEXV06.0501
BEX	BBEX91000679	11/23/2011 14:33:13	11/30/2010	BBEXV06.0501
BEX	BBEX91000680	11/23/2011 14:34:26	11/30/2010	BBEXV06.0501
BEX	BBEX91000680	11/23/2011 14:34:26	9/7/2011	CBEXV06.0501
BEX	BBEX91000758	11/23/2011 14:40:19	8/30/2011	CBEXV06.84LA
BEX	BBEX91000783	11/23/2011 14:41:29	8/30/2011	CBEXV06.84LA
VVWX	BVVWX91000666	11/28/2011 10:17:41	11/28/2011	CVWXXV02.5259
VVWX	BVVWX91000667	11/28/2011 10:18:52	11/28/2011	CVWXXV02.5259
VVWX	BVVWX91000820	11/28/2011 8:40:21	5/26/2011	CPRXT03.0CHD
VVWX	BVVWX91000820	11/28/2011 8:40:21	10/31/2011	BVWXT03.0HEV
VVWX	BVVWX91000820	11/28/2011 8:40:21	7/7/2011	CVWXT03.0HEV
VVWX	BVVWX91000820	11/28/2011 8:40:21	1/6/2011	BPRXT03.0CHD
VVWX	BVVWX91000820	11/28/2011 8:40:21	9/27/2011	DPRXT03.0CHD
VVWX	BVVWX91000842	11/28/2011 8:39:10	9/27/2011	DPRXT03.0CHD
VVWX	BVVWX91000842	11/28/2011 8:39:10	5/26/2011	CPRXT03.0CHD
VVWX	BVVWX91000842	11/28/2011 8:39:10	10/31/2011	BVWXT03.0HEV
VVWX	BVVWX91000842	11/28/2011 8:39:10	7/7/2011	CVWXT03.0HEV
VVWX	BVVWX91000842	11/28/2011 8:39:10	1/6/2011	BPRXT03.0CHD
VVWX	CVWXX91000960	11/28/2011 8:45:31	7/7/2011	CVWXXV02.0U4S
VVWX	CVWXX91000985	11/28/2011 8:44:19	7/7/2011	CVWXXV02.0U4S

MFR_NM	MFR_CD	Modified	Verify TEST_NUMBER	Applicable Testgroup	Needing Reprocessing
Audi	ADX	CADX91000951		CADXV02.53UK	
Audi	ADX	CADX91000966		CADXT03.03UG	
Audi	ADX	CADX91000967		CADXT03.03UG	
Audi	ADX	CADX91000988		CADXV02.53UK	
Bentley Motors Ltd.	BEX	BBEX91000679		BBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000679		CBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000680		BBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000680		CBEXV06.0501	
Bentley Motors Ltd.	BEX	BBEX91000758		CBEXV06.84LA	
Bentley Motors Ltd.	BEX	BBEX91000783		CBEXV06.84LA	
Volkswagen	VWX	BVWX91000820		BPRXT03.0CHD	
Volkswagen	VWX	BVWX91000820		BVWXT03.0HEV	
Volkswagen	VWX	BVWX91000820		CPRXT03.0CHD	
Volkswagen	VWX	BVWX91000820		CVWXT03.0HEV	
Volkswagen	VWX	BVWX91000820		DPRXT03.0CHD	
Volkswagen	VWX	BVWX91000842		BPRXT03.0CHD	
Volkswagen	VWX	BVWX91000842		BVWXT03.0HEV	
Volkswagen	VWX	BVWX91000842		CPRXT03.0CHD	
Volkswagen	VWX	BVWX91000842		CVWXT03.0HEV	
Volkswagen	VWX	BVWX91000842		DPRXT03.0CHD	
Volkswagen	VWX	CVWX91000960		CVWXT02.0U4S	
Volkswagen	VWX	CVWX91000985		CVWXT02.0U4S	

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 12/8/2011 11:13:42 PM  
**Subject:** Re: Bugatti  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Reminds me more of an aircraft than a car!

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 12/08/2011 08:38 AM  
**Subject:** Bugatti

Hi Jim,  
I ran across this PowerPoint from when the Bugatti Veyron was introduced a few years ago. Thought you might like it.

Bill Rodgers  
Emissions Certification Specialist

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
Rochester Hills, MI  
United States  
office (248) 754-4219  
fax (248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

[attachment "Bugatti-veyron.pps" deleted by Jim Snyder/AA/USEPA/US]

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 12/9/2011 12:02:46 AM  
**Subject:** Re: Durability Procedure Carryover

Hi [Ex. 7] I believe I mentioned in our last phone call that Arvon Mitcham has moved to a new position in the ASD division. Each Cert Rep is now responsible for approving any alternate durability procedures for their respective manufacturers. I read your letter requesting approval for 2013MY. It refers to a document describing the procedure from 2006. Since I'm starting on this rather fresh, I would like you to send me the relevant documents, or latest version of them, that describe the cycle and its correlation to the SRC aging.

Have you supplied us any data recently to support the accuracy of the process versus actual aging or the SRC, such as the in-use emissions data? I would like to see what you have. Let's talk about this and what you have before you start doing anything. I'm not necessarily expecting anything on this for Tuesday's meeting.

I know VW uses the SRC for Diesel test groups. I also know that some test groups (Lamborghini only?) use a Bench Cycle, Please clarify which groups use the VM\_ADP and which the Bench Cycle.

I won't be in Friday but I will be available next week. Look forward to seeing you Tuesday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** Arvon Mitcham/AA/USEPA/US@EPA, [Ex. 7]@vw.com>, [Ex. 7]  
[Ex. 7]@vw.com>, "Giles, Michael" <michael.giles@vw.com>  
**Date:** 12/01/2011 09:44 AM  
**Subject:** Durability Procedure Carryover

Hello Jim:

Just a note to inform you that Volkswagen submitted to VERIFY a request for carryover of previously-approved durability procedures for the 2013 model year.

Best regards,

**Ex. 7**

**Ex. 7**

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 12/12/2011 7:28:25 PM  
**Subject:** RE: CHUB-Q5A Laboratory Data  
[2012 Q5 HEV 3rd FTP Hwy.pdf](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/12/2011 01:24 PM  
Subject: RE: CHUB-Q5A Laboratory Data

Hello Vince,  
I saw the test results on Verify. Would you mind sending the lab results pages? They are much easier to digest.

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

From: Mazaitis.Vincent@epamail.epa.gov [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, December 09, 2011 1:04 PM  
To: Rodgers, William

Cc: Snyder.Jim@epamail.epa.gov  
Subject: Re: CHUB-Q5A Laboratory Data

Hello Bill,

I checked again after lunch and nothing yet. My guess is Monday. Hybrids still take longer. I'll keep on looking though and forward the data as soon as I get it.

Best regards,

Vince Mazaitis

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 12/09/2011 10:04 AM  
Subject: CHUB-Q5A Laboratory Data

Hello Vince,

Have you received any lab test data from yesterday's Audi Q5 Hybrid test? If you could scan and email it to my when you receive it I would appreciate it.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219


fax (248) 754-4207



william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

Cert

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0324-014				Vehicle ID: CHUB-Q5A			
<div style="display: flex; justify-content: space-between;"> <div>  </div> <div> <b>Test Information</b>            Test Date: 12/8/2011            Key Start / Hot Soak: 10:18:39 / 09:40            Fuel Container ID: F00023            Fuel Type: 61 Tier 2 Cert Test Fuel            Test Procedure: 21.04 Fed Fuel 2-day Exhaust (CAN LOAD)            Calculation Method: Gasoline            Pretest Remarks:         </div> <div>           MFR Name: AUDI            MFR Codes: 640            Config #: 00            Transmission: S            Shift Schedule: A09980005            Beginning Odometer: 004989.0 MI            Drive Schedule: ftp4bag            Soak Period: 22.8 hours         </div> </div>							
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
<b>Phase 1</b>							
Sample	7.324	28.412	1.566	0.993	2.650		
Ambient	2.822	0.000	0.003	0.044	1.977		
Net Concentration	4.712	28.412	1.563	0.952	0.821	3.739	
Remarks:							
<b>Phase 2</b>							
Sample	3.401	8.005	0.545	0.531	1.936		
Ambient	3.209	0.000	0.002	0.044	1.977		
Net Concentration	0.320	8.005	0.543	0.489	0.037	0.275	
Remarks:							
<b>Phase 3</b>							
Sample	4.330	26.068	0.486	0.848	1.960		
Ambient	4.361	0.000	0.002	0.044	1.984		
Net Concentration	0.246	26.068	0.484	0.807	0.101	0.126	
Remarks:							
<b>Phase 4</b>							
Sample	5.667	7.031	0.473	0.522	1.949		
Ambient	5.820	0.000	0.005	0.044	1.991		
Net Concentration	0.074	7.031	0.468	0.480	0.036	0.031	
Remarks:							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.059	0.724	0.059	381.5	0.012	0.047 / 0.049	23.313
Phase 2	0.006	0.324	0.032	311.3	0.001	0.006 / 0.006	28.623
Phase 3	0.003	0.664	0.018	322.8	0.001	0.002 / 0.002	27.561
Phase 4	0.001	0.284	0.028	304.6	0.001	0.001 / 0.001	29.260
Weighted	0.01506	0.48856	0.03259	327.041	0.00333	(NMOG=1.04xNMHC) 0.0116 / 0.0121	
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>				<u>Dyno #:</u>	
Phase 1	23.26					Dyno #: D329 - AWD	
Phase 2	28.56					Inertia: 4750	
Phase 3	27.50					EPA Set Co A: -9.61	
Phase 4	29.19	<u>1% SOC Limit</u>	<u>Act SOC A-hr</u>	<u>Sys Nom Volts</u>	<u>Charge State</u>	EPA Set Co B: -0.164	
		0.6971	0.0672	264.0	Pass	EPA Set Co C: 0.02573	
Weighted	27.16					Emiss-Bench: Mexa 7200sle	

v101208 - d329 EPAVDAEm111208100938

Page 1 of 2

Print Time 12-Dec-2011 09:23

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data  
Test Number: 2011-0324-014

Vehicle ID: CHUB-Q5A

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.185
Phase 1	0.214	2.602	0.211	1370.4	0.043	0.170	
Phase 2	0.025	1.249	0.125	1199.5	0.003	0.021	
Phase 3	0.011	2.386	0.065	1160.5	0.005	0.006	
Phase 4	0.006	1.096	0.107	1176.2	0.003	0.002	



## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.22	29.22	29.22	29.22
Avg Cell Temp (degF)	75.11	75.17	75.22	75.27
Dew Point (degF)	48.13	47.67	47.67	47.77
Specific Humidity (grains/lbm)	51.09	50.21	50.21	50.41
NOx Corr Factor	0.8990	0.8956	0.8957	0.8964
CO2 Dilution Factor	13.442	25.169	15.752	25.59
CFV Vmix (scf @68F)	2777.66	4731.08	2776.46	4727.19
CVS Flow Rate Avg (scfm)	328.01	324.45	328.77	326.20
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	508.10	869.90	506.70	869.49
Distance (miles)	3.592	3.853	3.595	3.862
Bag Analysis Time (secs)	143.8	148.7	143.8	155.2

## MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0163	0.51	0.03	306	0	0.0136

Odometer  
4448 M

MPG  
29


MPG is 6.76 % higher than EPA MPG

MFR Lab: Audi AG Neckarsulm

Dyno: 7

Fuel: 61 Tier 2 Cert Gasoline

CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2011-0324-015				Vehicle ID: CHUB-Q5A			
<div style="display: flex; justify-content: space-between;"> <div style="width: 15%;">  </div> <div style="width: 45%;"> <b>Test Information</b>            Test Date: 12/8/2011            Key Start: 12:13:36            Fuel Container ID: F00023            Fuel Type: 61 Tier 2 Cert Test Fuel            Test Procedure: 03 HWFET (hwfelprep_hwfet)            Calculation Method: Gasoline            Pretest Remarks:         </div> <div style="width: 40%;">           MFR Name: AUDI            MFR Codes: 640            Config #: 00            Transmission: S            Shift Schedule: A09980011            Beginning Odometer: 005004.0 MI            Drive Schedule: hwfet_hwfet         </div> </div>							
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	6.470	32.434	0.231	1.233	2.265		
Ambient	5.832	0.000	0.005	0.044	1.995		
Net Concentration	1.176	32.434	0.227	1.193	0.454	0.638	
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.008	0.434	0.004	250.7	0.003	0.004 / 0.004	35.503
(NMOG=1.04xNMHC)							
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>			<u>Dyno Settings</u>		<u>Dyno #:</u> D329 - AWD	
Phase 1	35.42					Inertia: 4750	
	<u>1% SOC Limit</u>	<u>Act SOC A-hr</u>	<u>Sys Nom Volts</u>	<u>Charge State</u>	EPA Set Co A: -9.61		
	0.3675	-0.0288	264.0	Pass	EPA Set Co B: -0.164		
					EPA Set Co C: 0.02573		
					Emiss-Bench: Mexa 7200sle		
v101208 - d329 EPAVDAEm111208115153 Page 1 of 2 Print Time 12-Dec-2011 09:23							

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2011-0324-015

Vehicle ID: CHUB-Q5A

## Results



	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.080	4.437	0.046	2564.6	0.036	0.043	1.185

## Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.18			
Avg Cell Temp (degF)	75.32			
Dew Point (degF)	47.54			
Specific Humidity (grains/lbm)	50.02			
NOx Corr Factor	0.8949			
CO2 Dilution Factor	10.835			
CFV Vmix (scf @68F)	4149.45			

CVS Flow Rate Avg (scfm) 325.45

Fan Placement: One Fan - Up - Front

Phase Time (secs)	765.00
Distance (miles)	10.230
Bag Analysis Time (secs)	144.8

## MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0125	0.25	0.005	223	0	0.0095

Odometer  
4301 M

MPG  
39.8

MPG is 12.36 % higher than EPA MPG

MFR Lab: Audi Ingolstadt

Dyno: 8

Fuel: 61 Tier 2 Cert Gasoline

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 12/19/2011 6:24:22 PM  
**Subject:** Re: VW Group - 2013MY Certificates MIA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

According Verify they were signed 12/16. I don't know why you didn't a confirmation note but they look okay in Verify.

On another note , I just found out that there was a problem with the Shed over the w/e and the test voided.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 12/19/2011 10:07 AM  
Subject: VW Group - 2013MY Certificates MIA

Hello Jim,  
Thanks for processing our 2013MY certificates last Thursday. The following two certificates are still Missing in Action. Can you confirm if they have been signed?

I have received a Verify message on Friday Dec 16th stating "Certificate Number DVWXJ02.03UA-006 with Evaporative Family DVWXR0110D38 has been issued" and received the certificate linked in the message.

Missing certificates:

I have received a Verify message on Friday Dec 16th stating "The certificate request for Test Group DVWXJ02.03UA and Evaporative Family DVWXR0125D41 has been approved and is now waiting to be signed". No message has been received confirming the certificate was signed (as seen above).  
Verify Transaction Identifier: \_4d33228b-39a0-4f2c-a297-ed83c57bb658

I have received a Verify message on Friday Dec 16th stating "The certificate request for Test Group DVWXJ02.03UA and Evaporative Family DVWXR0125D46 has been approved and is now waiting to be signed". No message has been received confirming the certificate was signed (as seen above).  
Verify Transaction Identifier: \_3e284f93-b528-4e5f-bf53-9c67ce7302a9

Thanks,  
Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 12/20/2011 6:09:27 PM  
**Subject:** RE: VW Group - 2013MY Certificates MIA  
[DVWXJ02.03UA cert b.pdf](#)  
[DVWXJ02.03UA cert a.pdf](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Bill, we've found 2 other manufacturers who didn't get notification of their certificates. Check if they are in your CDX folder and let me know if you hear anything from The help desk. Meanwhile I can send you copies of the certificates to your email.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 12/19/2011 01:38 PM  
**Subject:** RE: VW Group - 2013MY Certificates MIA

Thanks Jim,  
I will check Verify again later and contact the help desk if necessary.

Please let us know as soon as you have an indication on a Shed retest date for the Q5 Hybrid.

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, December 19, 2011 1:24 PM  
To: Rodgers, William  
Subject: Re: VW Group - 2013MY Certificates MIA

According Verify they were signed 12/16. I don't know why you didn't a confirmation note but they look okay in Verify.

On another note , I just found out that there was a problem with the Shed over the w/e and the test voided.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 12/19/2011 10:07 AM  
Subject: VW Group - 2013MY Certificates MIA

Hello Jim,  
Thanks for processing our 2013MY certificates last Thursday. The following two certificates are still Missing in Action. Can you confirm if they have been signed?

I have received a Verify message on Friday Dec 16th stating "Certificate Number DVWXJ02.03UA-006 with Evaporative Family DVWXR0110D38 has been issued" and received the certificate linked in the message.

Missing certificates:

I have received a Verify message on Friday Dec 16th stating "The certificate request for Test Group DVWXJ02.03UA and Evaporative Family DVWXR0125241 has been approved and is now waiting to be signed". No message has been received confirming the certificate was signed (as seen above).

Verify Transaction Identifier: \_4d33228b-39a0-4f2c-a297-ed83c57bb658

I have received a Verify message on Friday Dec 16th stating "The certificate request for Test Group DVWXJ02.03UA and Evaporative Family DVWXR0125D46 has been approved and is now waiting to be signed". No message has been received confirming the certificate was signed (as seen above).

Verify Transaction Identifier: \_3e284f93-b528-4e5f-bf53-9c67ce7302a9

Thanks,  
Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
2013 MODEL YEAR  
CERTIFICATE OF CONFORMITY  
WITH THE CLEAN AIR ACT OF 1990

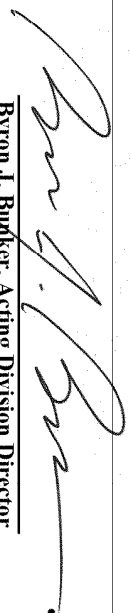
OFFICE OF TRANSPORTATION  
AND AIR QUALITY  
ANN ARBOR, MICHIGAN 48105

Certificate Issued To: Volkswagen  
(U.S. Manufacturer or Importer)

Certificate Number: DVWXXJ02.03U A-005

Effective Date:  
01/02/2012

Expiration Date:  
12/31/2013

  
Byron J. Buckner, Acting Division Director  
Compliance Division

Issue Date:  
12/16/2011

Revision Date:  
N/A

Test Group Name: DVWXXJ02.03U A

Evaporative/Refueling Family Name: DVWXXR0125D46

Applicable Exhaust Emission Standards: Federal Tier 2 Bin 5

Applicable Evaporative/Refueling Standards: Federal LEV-II Evap

Models Covered: Volkswagen: CC

Engine Displacement: 2.0 Liters

Exhaust Emission Test Fuel Type: Tier 2 Cert Gasoline

Full Useful Life Miles: Exhaust Emissions: 120,000 miles

Full Useful Life Miles: Evaporative/Refueling Emissions: 120,000 miles

Pursuant to section 206 of the Clean Air Act (42 U.S.C. 7525) and 40 CFR Parts 85, 86, 88, and 600 as applicable, this certificate of conformity is hereby issued with respect to test vehicles which have been found to conform to the requirements of the regulations on Control of Air Pollution from New Motor Vehicles and New Motor Vehicle Engines (40 CFR Parts 85, 86, 88, and 600 as applicable) and which represent the new motor vehicle models listed above by test group and evaporative/refueling emission family, more fully described in the application of the above named manufacturer. Vehicles covered by this certificate have demonstrated compliance with the applicable emission standards as more fully described in the manufacturer's application. This certificate covers the above models, which are designed to meet the applicable emission standards specified in 40 CFR Parts 85, 86, 88, and 600 as applicable at both high and low altitude as applicable.

EPA is issuing this certificate subject to the conditions and provisions of 40 CFR 86.1848(c).

This certificate covers only those new motor vehicles or vehicle engines which conform, in all material respects, to the design specifications that apply to those vehicles or engines described in the documentation required by 40 CFR Parts 85, 86, 88, and 600 as applicable and which are produced during the 2013 model year production period stated on this certificate of the said manufacturer, as defined in 40 CFR Parts 85, 86, 88, and 600 as applicable. The manufacturer shall obtain the approval of the California Air Resources Board (in the form of an executive order issued by the California Air Resources Board) prior to introducing any vehicle covered by this certificate into commerce (1) in the State of California, or (2) in a State that, under the authority of Section 177 of the Clean Air Act, has adopted and placed into effect the California standards to which this test group has been certified.

Catalyst-equipped vehicles designed to be operated on gasoline or flexible fuel are equipped with an emission control device which the Administrator has determined will be significantly impaired by the use of leaded fuel. This certificate is issued subject to the conditions specified in 40 CFR 80.24. Catalyst-equipped vehicles designed to be operated on gasoline or flexible fuel, otherwise covered by this certificate, which are driven outside the United States, Canada, Mexico, Japan, Australia, Taiwan and the Bahama Islands will be presumed to have been operated on leaded fuel resulting in deactivation of the catalysts. If these vehicles are imported or offered for importation without retrofit of the catalyst, they will be considered not to be within the coverage of this certificate unless included in a catalyst control program operated by manufacturer or a United States Government Agency and approved by the Administrator.

In the case of completely assembled vehicles, this certificate of conformity covers only vehicles which are completely manufactured prior to January 1, 2014. Normally incompletely assembled vehicles (such as cab chassis) may be completed after this date, provided that the basic manufacturing (including installation of the emission control system) was completed prior to January 1, 2014. This certificate does not cover vehicles sold, offered for sale, or introduced, or delivered for introduction, into commerce in the U.S. prior to the effective date of the certificate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
2013 MODEL YEAR  
CERTIFICATE OF CONFORMITY  
WITH THE CLEAN AIR ACT OF 1990

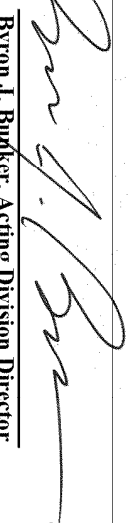
OFFICE OF TRANSPORTATION  
AND AIR QUALITY  
ANN ARBOR, MICHIGAN 48105

Certificate Issued To: Volkswagen  
(U.S. Manufacturer or Importer)

Certificate Number: DVWXXJ02.03U-A-004

Effective Date:  
01/02/2012

Expiration Date:  
12/31/2013

  
Byron J. Buckner, Acting Division Director  
Compliance Division

Issue Date:  
12/16/2011

Revision Date:  
N/A

Test Group Name: DVWXXJ02.03U-A

Evaporative/Refueling Family Name: DVWXXR0125241

Applicable Exhaust Emission Standards: Federal Tier 2 Bin 5

Applicable Evaporative/Refueling Standards: Federal LEV-II Evap

Models Covered: Volkswagen: TIGUAN, TIGUAN 4MOTION

Engine Displacement: 2.0 Liters

Exhaust Emission Test Fuel Type: Tier 2 Cert Gasoline

Full Useful Life Miles: Exhaust Emissions: 120,000 miles

Full Useful Life Miles: Evaporative/Refueling Emissions: 120,000 miles

Pursuant to section 206 of the Clean Air Act (42 U.S.C. 7525) and 40 CFR Parts 85, 86, 88, and 600 as applicable, this certificate of conformity is hereby issued with respect to test vehicles which have been found to conform to the requirements of the regulations on Control of Air Pollution from New Motor Vehicles and New Motor Vehicle Engines (40 CFR Parts 85, 86, 88, and 600 as applicable) and which represent the new motor vehicle models listed above by test group and evaporative/refueling emission family, more fully described in the application of the above named manufacturer. Vehicles covered by this certificate have demonstrated compliance with the applicable emission standards as more fully described in the manufacturer's application. This certificate covers the above models, which are designed to meet the applicable emission standards specified in 40 CFR Parts 85, 86, 88, and 600 as applicable at both high and low altitude as applicable.

EPA is issuing this certificate subject to the conditions and provisions of 40 CFR 86.1848(c).

This certificate covers only those new motor vehicles or vehicle engines which conform, in all material respects, to the design specifications that apply to those vehicles or engines described in the documentation required by 40 CFR Parts 85, 86, 88, and 600 as applicable and which are produced during the 2013 model year production period stated on this certificate of the said manufacturer, as defined in 40 CFR Parts 85, 86, 88, and 600 as applicable. The manufacturer shall obtain the approval of the California Air Resources Board (in the form of an executive order issued by the California Air Resources Board) prior to introducing any vehicle covered by this certificate into commerce (1) in the State of California, or (2) in a State that, under the authority of Section 177 of the Clean Air Act, has adopted and placed into effect the California standards to which this test group has been certified.

Catalyst-equipped vehicles designed to be operated on gasoline or flexible fuel are equipped with an emission control device which the Administrator has determined will be significantly impaired by the use of leaded fuel. This certificate is issued subject to the conditions specified in 40 CFR 80.24. Catalyst-equipped vehicles designed to be operated on gasoline or flexible fuel, otherwise covered by this certificate, which are driven outside the United States, Canada, Mexico, Japan, Australia, Taiwan and the Bahama Islands will be presumed to have been operated on leaded fuel resulting in deactivation of the catalysts. If these vehicles are imported or offered for importation without retrofit of the catalyst, they will be considered not to be within the coverage of this certificate unless included in a catalyst control program operated by manufacturer or a United States Government Agency and approved by the Administrator.

In the case of completely assembled vehicles, this certificate of conformity covers only vehicles which are completely manufactured prior to January 1, 2014. Normally incompletely assembled vehicles (such as cab chassis) may be completed after this date, provided that the basic manufacturing (including installation of the emission control system) was completed prior to January 1, 2014. This certificate does not cover vehicles sold, offered for sale, or introduced, or delivered for introduction, into commerce in the U.S. prior to the effective date of the certificate.

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/3/2012 11:16:45 PM  
**Subject:** Re: VW Group - ORVR Information MY2013 Jetta Hybrid 1.4L

Mike, thanks for the heads up, Verify doesn't notify me. I'll look at it tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 01/03/2012 04:40 PM  
Subject: VW Group - ORVR Information MY2013 Jetta Hybrid 1.4L

Hello Jim,

I hope you had a good holiday break and new year, and are looking forward to a great 2012!

Just so you are aware, today we submitted a ORVR document for the 2013 Jetta Hybrid for your review.  
Please let me know if you have any questions.

Regards,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/9/2012 7:59:17 PM  
**Subject:** Re: VW Group - Audi Q5 Hybrid

Not yet but I think it was a valid test. I think we'll see results tuesday morning if not this afternoon yet.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 01/09/2012 02:27 PM  
Subject: VW Group - Audi Q5 Hybrid

Hi Jim,  
Any shed results yet for last week's test?

Bill

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 1/10/2012 6:03:09 PM  
**Subject:** RE: VW Group - Audi Q5 Hybrid standards

Let Ben Haynes know when you decide when you will pick it up. 734-214-4261

It still shows the wrong limit in at least some parts of Verify. I'll have to look around and see where it wasn't updated.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 01/10/2012 10:55 AM  
Subject: RE: VW Group - Audi Q5 Hybrid standards

Hi Jim,  
We have confirmed that the test data is acceptable, please release the vehicle for pick-up.

My message below regarding the standards in Verify is incorrect. After further investigation, I found that the Evap standards in the Verify system test group information were corrected on October 13, 2011 to reflect the LDT (6,000 GVWR and under) standards. At that time we submitted a revised Initial Application with new Sec. 7 CSI named CBI\_CADXT02.0HUB\_APP\_INI\_R01.PDF. It appears the erroneous information you have is based on the initial submission.

Thanks,  
Bill

From: Rodgers, William  
Sent: Tuesday, January 10, 2012 9:56 AM  
To: 'Jim Snyder'  
Subject: VW Group - Audi Q5 Hybrid standards

Hi Jim,  
As a follow up to your call, the Q5 Hybrid Evap standards in Verify are incorrectly stated as LDT (6,001-8,500 GVWR standards). I will update Verify to reflect the correct LDT (6,000 GVWR and under) standards. It also looks like I need to correct the curb weight in Section 12 of the application so I will include that in the revised application. Thanks for the feedback.

Bill



**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 1/26/2012 8:26:21 PM  
**Subject:** RE: VW Group - Decision Information  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

I waived them.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>  
Date: 01/25/2012 02:44 PM  
Subject: RE: VW Group - Decision Information

Jim,  
The Decision Information for the T2B3 version was submitted as mentioned below. Please waive these also.  
Vehicle ID: 464 00042/13, Configuration 0

Hopefully, I can avoid doing this again!

Bill

From: Rodgers, William  
Sent: Wednesday, January 25, 2012 1:15 PM  
To: 'Jim Snyder'  
Cc: Giles, Michael  
Subject: VW Group - Decision Information

Hello Jim,  
I submitted the T2B5/ULEV VW CC tests and Decision Information we discussed this morning regarding a test data resubmission as 2013 model year, intended to replace the 2008 model year data you previously waived. The new Vehicle ID is: VW462 8-0062/13\_Configuration 0. Please waive the confirmatory testing so I can enter the manufacturer confirmatory HWY test we did.

There will be another similar resubmission coming for the corresponding T2B3/SULEV version of this car.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William (EEO)"  
**Sent:** Thur 2/14/2013 8:10:45 PM  
**Subject:** RE: Test waiver VID VW324 30111/1

Got it thanks

From: Rodgers, William (EEO)  
Sent: Thursday, February 14, 2013 1:18 PM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Subject: Test waiver VID VW324 30111/1

Hi Jim,

I wasn't able to catch you at your desk. We received the following confirmatory test waiver but are wondering if you missed Configuration-1 (Beetle coupe), or are you planning to test it?

Testing Waived: VWX Vehicle ID: VW324 30111 Vehicle Configuration: 0

Thanks,

Bill Rodgers

VWGoA EEO

(248) 754-4219

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** CN=Lynn Sohacki/OU=AA/O=USEPA/C=US@EPA;CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Arvon Mitcham/OU=AA/O=USEPA/C=US  
**Sent:** Mon 2/23/2009 6:43:09 PM  
**Subject:** Re: MY 2008 Equivalency Factors VW\_AUDI UPDATE.xls  
[MY 2008 Equivalency Factors VW\\_AUDI UPDATE.xls](#)  
[10DUR-VWA-26654.pdf](#)

Dear Mr. Kata:

Attached is an electronic version of your 2010 Model Year Durability Approval Letter. A hard-copy has also been sent to you and it should be arriving soon. If you do not receive it, please let us know and we can send another hard copy or you can use this electronic version to generate a copy.

If you have any questions or concerns, please let us know. Thank you for your cooperation and we look forward to working with you in the future.

- Arvon L. Mitcham  
Project Manager/Engineer  
U.S. Environmental Protection Agency  
Office of Transportation and Air Quality  
Compliance and Innovative Strategies Division

"Kata, Leonard" <Leonard.Kata@vw.com>  
Sent by: "Kata, Leonard" <Leonard.Kata@vw.com>  
Received Date:  
10/23/2008 11:56 AM  
Transmission Date:  
10/23/2008 11:56:54 AM  
To Arvon Mitcham/AA/USEPA/US@EPA  
cc  
Subject MY 2008 Equivalency Factors VW\_AUDI UPDATE.xls

Hello Arvon:

I have updated your industry spreadsheet with MY 2008 Equivalency Factors for Volkswagen, Audi, Bentley, Lamborghini, and Bugatti (see attachment). The only section that I worked on has the cells highlighted

light green. Updates include:

- Addition of missing information
- Removal of duplicated rows
- Grouping of information by Test Group and displacement (although I put the VW and Audi LDTs at the end of their respective lists)
- Addition of Bugatti
- Notation of Assigned DFs

I wasn't sure if you wanted to call out Bentley, Lamborghini, and Bugatti as manufacturers separate from the Volkswagen list.

Please let me or Bob Hart (robert.hart@vw.com) know if you have any additional questions.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY  
2565 PLYMOUTH ROAD  
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF  
AIR AND RADIATION

February 20, 2009

Mr. Leonard W. Kata  
Manager, Emissions Regulation and Certification  
Engineering and Environmental Office  
Volkswagen of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI. 48326

Subject: Approval of the Carry-Over Request for Volkswagen's Model Year 2010  
Alternative Durability Procedures

Dear Mr. Kata:

We received your letter dated January 30, 2009 requesting approval to carry-over Volkswagen's alternative whole vehicle and bench-aging durability procedures for the 2010 model year.

We have reviewed the attached package of materials you forwarded and deem that it is compliant with 40 CFR §86.1823-08(e). Therefore, we are approving your alternative whole vehicle and bench-aging durability procedure for the 2010 model year.

If you have questions or concerns regarding this approval, please contact Mr. Arvon L. Mitcham at (734) 214-4522 or Ms. Lynn Sohacki at (734) 214-4851. Thank you.

Respectfully,

Linc Wehrly, Manager  
Light-Duty Vehicles Group

cc: Arvon L. Mitcham  
Lynn Sohacki  
U.S. EPA-OTAQ-CISD  
10DUR-VWA-26654



Printed on Recycled Paper

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 2/6/2012 1:06:22 PM  
**Subject:** VW Group - Lamborghini Start-Stop Questions  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

Mike Giles is out today so I am forwarding this information in reply to your questions regarding the Lamborghini Aventador with Start&Stop technology, test group DNLXV06.5L83.

We have confirmed the following:

- 1) Production vehicles will have a button to deactivate/activate the Start&Stop operation on the driver command.
- 2) The strategy is DEFAULT ON (i.e. every time you start the engine, the Start&Stop system is enabled, independently on the status at key off).
- 3) The test vehicle is a pre-production unit and does not have the button installed, it is instead programmed to remain in Start&Stop ON mode. This is based on the expectation that tests are to be performed in that mode. If you chose to confirm this vehicle, please let us know if it is vital that a driver activated switch be installed in the test vehicle?

Regards,

Bill Rodgers

Emissions Certification Engineer

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Engineering and Environmental Office

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Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



**To:** christoph.kohnen@vw.com[]  
**Cc:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;leonard.kata@vw.com[];  
eonard.kata@vw.com[]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Mon 2/6/2012 5:58:57 PM  
**Subject:** Re: SUBJECT: Evaporative durability aging fuel for gasoline vehicles  
<http://www.epa.gov/otaq/regs/fuels/additive/e15/>

Christoph,

Please let me know how you are coming on my Evap durability questions. If, possible, I could use your answers in the next two weeks.

Thanks

Dave

---

**From:** David Good/AA/USEPA/US  
**To:** christoph.kohnen@vw.com  
**Cc:** leonard.kata@vw.com, Jim Snyder/AA/USEPA/US@EPA  
**Date:** 12/16/2011 05:14 PM  
**Subject:** SUBJECT: Evaporative durability aging fuel for gasoline vehicles

Dr. Kohnen,

Background: As you know, for evaporative durability programs, the provisions of 40 CFR 86.1824-08, require that the service accumulation fuel "contains ethanol in, at least, the highest concentration permissible in gasoline under federal law and that is commercially available in any state in the United States. Unless otherwise approved by the Administrator, the manufacturer must determine the appropriate ethanol concentration by selecting the highest legal concentration commercially available during the calendar year before the one in which the manufacturer begins its mileage accumulation." This requirement applies mostly to whole vehicle evaporative durability programs. For evaporative bench aging programs, aging procedures are required to be "designed using good engineering judgment, to evaluate the emission deterioration of evaporative control systems" including any deterioration caused by the effects of in-use fuels (including ethanol content) on the evaporative system; ref. 40 CFR 86.1824-08(d) and (e).

Status of E15 in-use fuel: As of November 15, 2011, E15 has been approved by EPA, but has not yet been registered with EPA (and therefore was not yet legal for distribution or for sale as a transportation fuel at that time). See <http://www.epa.gov/otaq/regs/fuels/additive/e15/>.

Manufacturer's evaporative durability programs: I'm thinking that most manufacturers will be proactive regarding the ethanol content of their evaporative service accumulation/bench aging fuel. For example, I'm thinking that some manufacturers may have already begun using E15 (or higher) evaporative durability fuel or will soon begin using it, especially for new evaporative families which are expected to be carried over for several years. [Note: I'm referring to the evaporative service accumulation/bench aging fuel only, not the evaporative test fuel.]

Questions: When you get a chance, please email us the following information:

1. Please describe what type of evaporative durability program(s) you are using for 2013 evaporative families, e.g. whole vehicle, bench aging, or both. If both, please provide the approximate

percentage of each.

2. Please describe your plans to phase in the use of E15 (or higher) for evaporative durability programs. If possible, please provide the ethanol content you intend to use for 2013, 2014 and 2015 model year evaporative durability programs.

For example, your response could indicate that “For the 2013 model year we will use bench aging evaporative durability programs, only. For the 2013 model year, we expect to have 5 evaporative/refueling families, of which 4 are carryover and will simulate the evaporative durability effects of E10 and one will simulate the evaporative durability effects of E15” with similar statements for 2014 and 2015 model year.

Thanks

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 2/8/2012 3:36:21 PM  
**Subject:** VW Group - 2.5L Certificate Requests  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I've submitted 8 Certificate Requests covering the (4) 2013 Volkswagen 2.5L test groups listed below. There is no rush on these considering the market introduction date is June.

These requests are all carryovers based on 2012 test groups with no new tests or technical changes. The only difference from 2012 is that we chose to separate them into 4 (transmission specific) test groups for 2013 , i.e., 2 for automatic models and 2 for manual models. This was done for (MSAT) Cold NMHC Standard purposes. See below:

2012 Test Grp

2013 Test Grp

2013 Test Group Standard Cold NMHC

DVWXV02.5A59

Auto.

0.40

CVWXV02.5259

DVWXV02.5M59

Man.

0.30

DVWXV02.5U3A

Auto.

0.40

CVWXV02.5U35

DVWXV02.5U3M

Man.

0.30

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA;"healy.steve@epamail.epa.gov"  
[healy.steve@epamail.epa.gov]; healy.steve@epamail.epa.gov"  
[healy.steve@epamail.epa.gov]  
**From:** "Giles, Michael"  
**Sent:** Thur 2/9/2012 1:13:04 PM  
**Subject:** RE: VW Group - Lamborghini Start-Stop Questions  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim / Steve,

Regarding the confirmatory test for the Lamborghini Aventador (vehicle /Config. LB83-DSSCD / 0), the original availability date supplied in the D.I. request was March 14th. However, we were just informed that this date would need to be pushed back approximately 2 weeks.

I should have a firm date soon but wanted to let you know in case scheduling was underway. If it makes sense at this stage to correct this date in the DI , let me know.

Thanks,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, February 06, 2012 6:32 PM  
To: Jim Snyder  
Cc: Rodgers, William; Giles, Michael  
Subject: Re: VW Group - Lamborghini Start-Stop Questions

I will be gone the rest of the week so call Steve Healy if any questions. x4121

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: Jim Snyder/AA/USEPA/US

To: "Rodgers, William" <William.Rodgers@vw.com>  
Cc: "Giles, Michael" <michael.giles@vw.com>  
Date: 02/06/2012 06:27 PM  
Subject: Re: VW Group - Lamborghini Start-Stop Questions

Since the default is enabled, it resets to enabled, and its a low volume Lamborghini, I don't see a need to test with it disabled. If this was a more typical volume vehicle I would first require more info on the enablement parameters and that you to bring a sample vehicle for us to evaluate (like the Audis).

I would still like a list from them of the parameters and settings that enable/disable the feature.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>  
Date: 02/06/2012 08:52 AM  
Subject: VW Group - Lamborghini Start-Stop Questions

Hello Jim,  
Mike Giles is out today so I am forwarding this information in reply to your questions regarding the Lamborghini Aventador with Start&Stop technology, test group DNLXV06.5L83.

We have confirmed the following:

- 1) Production vehicles will have a button to deactivate/activate the Start&Stop operation on the driver command.
- 2) The strategy is DEFAULT ON (i.e. every time you start the engine, the Start&Stop system is enabled, independently on the status at key off).
- 3) The test vehicle is a pre-production unit and does not have the button installed, it is instead programmed to remain in Start&Stop ON mode. This is based on the expectation that tests are to be performed in that mode. If you chose to confirm this vehicle, please let us know if it is vital that a driver activated switch be installed in the test vehicle?

Regards,

Bill Rodgers

Emissions Certification Engineer

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Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Rodgers, William"  
[William.Rodgers@vw.com]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Mon 2/13/2012 6:28:01 PM  
**Subject:** VW Group: Request for Approval for an Alternate Cooling Fan for Emission Testing for  
the MY 2013 Lamborghini Aventador  
[CBI\\_DNLXV06.5L83\\_RFA\\_STP\\_R00.PDF](#)  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Hello Jim,

The Verify System is down, so if necessary, I will submit this through it when the system is working again.

The attachment is a request for approval of an alternate cooling fan for emission testing of the MY 2013  
Lamborghini Aventador. Please see the attachment.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326



Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: [robert.hart@vw.com](mailto:robert.hart@vw.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 2/14/2012 12:24:42 PM  
**Subject:** RE: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[Robert.Hart@vw.com](mailto:Robert.Hart@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Hello Jim,

**Ex. 4 - CBI**

Best regards,

Bob Hart

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, February 13, 2012 7:00 PM  
To: Hart, Robert (VWoA)  
Subject: Re: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Bob, I'm not sure I understand the graphic.

**Ex. 4 - CBI**

**Ex. 4 - CBI**

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency

(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 02/13/2012 01:27 PM  
Subject: VW Group: Request for Approval for an Alternate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

The Verify System is down, so if necessary, I will submit this through it when the system is working again.

The attachment is a request for approval of an alternate cooling fan for emission testing of the MY 2013 Lamborghini Aventador. Please see the attachment.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

[attachment "CBI\_DNLXV06.5L83\_RFA\_STP\_R00.PDF" deleted by Jim Snyder/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Tue 2/14/2012 1:23:31 PM  
**Subject:** VW Group - Decision Informations submitted - 12MY Beetle Conv Manual  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I submitted two Decision Information's today to support running changes which added new models to 2012 test groups, CVWXV02.03PA and CADXJ02.03UA. Both represent Beetle Convertible 2.0L TFSI Manual trans. FEDV's already certified with no new technology.

Thanks and welcome back,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 2/14/2012 9:16:51 PM  
**Subject:** VW Group - Decision Informations submitted - 12MY Beetle Conv AUTOMATIC  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I submitted Two more Decision Information's today to represent the Automatic transmission versions of those mentioned below.

Regards,

Bill

From: Rodgers, William  
Sent: Tuesday, February 14, 2012 8:24 AM  
To: 'Jim Snyder'  
Subject: VW Group - Decision Informations submitted - 12MY Beetle Conv Manual

Hi Jim,

I submitted two Decision Information's today to support running changes which added new models to 2012 test groups, CVWXV02.03PA and CADXJ02.03UA. Both represent Beetle Convertible 2.0L TFSI Manual trans. FEDV's already certified with no new technology.

Thanks and welcome back,

Bill Rodgers

Emissions Certification Engineer

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 2/15/2012 1:29:33 PM  
**Subject:** VW Group - Test waivers  
[image001.gif](#)

Hi Jim,

I received test waivers last night for 3 of the 4 Beetle Convertible Decision Information's I submitted. I was wondering if the (4th submittal) FEDV selected below was a random pick?

It happens to be a 2009 VW Eos test vehicle that's been around a while that we recently tested to represent a 2012 Beetle Convertible. Please let me know if you want to waive it.

FYI - We will also be sending you Decision Information for two start/stop vehicles this week, 1- Audi V8 and 1-Bentley V8.

Thanks,

Bill

**From:** Verify Administrator  
**Subject:** Vehicle selected for Test VW465 790007/09, Supplemental Information needed  
**Date:** Tue 2/14/2012 6:57 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle:  
Manufacturer: ADX Vehicle ID: VW465 790007/09 Vehicle Configuration: 3 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 21 - Federal fuel 2-day exhaust (w/can load) 61 - Tier 2 Cert Gasoline 3 - HWFE 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline

Vehicle ID: VW465 790007/09

Vehicle Configuration #: 3

Test Group Name: CADXJ02.03UA

Transaction Identifier: \_8714bb1c-2873-4196-87aa-44db24014319



**To:** Verify Help Desk [verifyhelp@csc.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 2/15/2012 2:38:55 PM  
**Subject:** Verify email notifications  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello,

It appears that none of the Verify users here at Volkswagen are receiving email notifications for (at least) Confirmatory Test Waivers. Please investigate.

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** Ex. 6  
**Sent:** Wed 2/15/2012 4:42:39 PM  
**Subject:** Re: Verify email notifications (HLP-2310)

Mr. Rodgers,

Verify help desk ticket HLP-2310 was opened for your request. Do you happen to know when the confirmatory tests were waived?

Ex. 6

Verify Help Desk  
Staffed by Computer Sciences Corporation,  
Contractor to the Environmental Protection Agency

This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.

"Rodgers,  
William"  
<William.Rodgers@vw.com> To  
Verify Help Desk@CSC  
cc  
02/15/2012 09:38 AM Jim Snyder  
<Snyder.Jim@epamail.epa.gov>  
Subject  
Verify email notifications

Hello,  
It appears that none of the Verify users here at Volkswagen are receiving email notifications for (at least) Confirmatory Test Waivers. Please investigate.

Thanks,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to  
the ENVIRONMENT!

**To:** "Rodgers, William" [William.Rodgers@vw.com]; im Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 2/15/2012 6:06:03 PM  
**Subject:** RE: VW Group - Test waivers  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[image001.gif](#)

Jim,

I need to correct my statement below regarding upcoming data for start-stop vehicles. The test data we will be submitting today are is not for Start-stop equipped vehicles.

Sorry for the confusion.

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

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fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

From: Rodgers, William  
Sent: Wednesday, February 15, 2012 8:30 AM  
To: 'Jim Snyder'  
Cc: Giles, Michael  
Subject: VW Group - Test waivers

Hi Jim,

I received test waivers last night for 3 of the 4 Beetle Convertible Decision Information's I submitted. I was wondering if the (4th submittal) FEDV selected below was a random pick?

It happens to be a 2009 VW Eos test vehicle that's been around a while that we recently tested to represent a 2012 Beetle Convertible. Please let me know if you want to waive it.

FYI - We will also be sending you Decision Information for two start/stop vehicles this week, 1- Audi V8 and 1- Bentley V8.

Thanks,

Bill

From:

Verify Administrator

Subject:

Vehicle selected for Test VW465 790007/09, Supplemental Information needed

Date:

Tue 2/14/2012 6:57 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle:  
Manufacturer: ADX Vehicle ID: VW465 790007/09 Vehicle Configuration: 3 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 21 - Federal fuel 2-day exhaust (w/can load) 61 - Tier 2 Cert Gasoline 3 - HWFE 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline

Vehicle ID: VW465 790007/09

Vehicle Configuration #: 3

Test Group Name: CADXJ02.03UA

Transaction Identifier: \_8714bb1c-2873-4196-87aa-44db24014319

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 2/16/2012 4:07:13 PM  
**Subject:** VW Group - Confirmatory Testing ADX Vehicle ID: VW465 790007/09 Vehicle Configuration: 3  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted the Supplemental Information for the following vehicle.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle:

Manufacturer: ADX Vehicle ID: VW465 790007/09 Vehicle Configuration: 3 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 21 - Federal fuel 2-day exhaust (w/can load) 61 - Tier 2 Cert Gasoline 3 - HWFE 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline

Vehicle ID: VW465 790007/09

Vehicle Configuration #: 3

Test Group Name: CADXJ02.03UA



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 2/16/2012 7:34:12 PM  
**Subject:** VW Group - Bentley 4.0L Test Decision Information  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

As mentioned today, I have submitted the Decision Information for the following Bentley Continental V8 bi-turbo vehicles in test group DADXV04.03UJ.

D3UJ-BY62  
0 EDV

D3UJ-BY62  
1 FEDV

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Thur 2/16/2012 8:01:56 PM  
**Subject:** VW Group - Decision Information

Hello Jim,

I uploaded a D.I. for the Audi S8 4.0L bi-turbo, in test group DADXV04.03UJ.

The Vehicle ID is: D3UJ-S8Q configuration 0.

Note, this vehicle is in the same test group as the Bentley Continental Bill recently sent. It has cylinder deactivation , and does not have start/stop.

Please advise if you have any questions.

Regards

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Rodgers, William"  
[William.Rodgers@vw.com]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 2/21/2012 12:32:34 PM  
**Subject:** FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission  
Testing for the MY 2013 Lamborghini Aventador  
[CBI\\_DNLXV06.5L83\\_RFA\\_STP\\_R00.PDF](#)  
[Lamborghini Aventador Fan Placement.pdf](#)  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Hello Jim,

**Ex. 4 - CBI**

Regards

A.Baraldi

Please let me know what, if anything, should be submitted through the Verify System.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Monday, February 13, 2012 1:28 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)

Cc: Giles, Michael; Rodgers, William

Subject: VW Group: Request for Approval for an Alternate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

The Verify System is down, so if necessary, I will submit this through it when the system is working again.

The attachment is a request for approval of an alternate cooling fan for emission testing of the MY 2013 Lamborghini Aventador. Please see the attachment.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com



# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Leonard W. Kata Name  
Manager Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

February 13, 2012 Date

Subject: Approval Request for Alternate Cooling Fan Placement for Emissions  
Testing for the MY 2013 Lamborghini Aventador

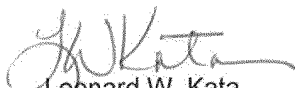
Dear Mr. Snyder,

We submit, on behalf of Automobili Lamborghini SpA, a request for approval of an alternate cooling fan placement for emission testing of the Lamborghini Aventador due to the unique configuration of the vehicle.

A diagram and explanation of the details is attached.

If you have any questions with regard to this request please contact our office in Auburn Hills at (248) 754-4229 or 754-4219.

Sincerely,



Leonard W. Kata  
Volkswagen Group of America, Inc.

Engineering and Environmental Office

Enclosure(s)

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLIN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000



# Ex. 4 - CBI

# Ex. 4 - CBI

# Ex. 4 - CBI

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Wed 2/22/2012 1:52:14 PM  
**Subject:** RE: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Thank you Jim.

We just submitted the supplemental information for this vehicle. Please advise of the test date at your earliest convenience.

Regards,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, February 21, 2012 7:02 PM  
To: Hart, Robert (VWoA)  
Cc: Giles, Michael; Rodgers, William  
Subject: Re: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Thank you , that is clearer.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 02/21/2012 07:32 AM  
Subject: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

# Ex. 4 - CBI

A.Baraldi

Please let me know what, if anything, should be submitted through the Verify System.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Monday, February 13, 2012 1:28 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael; Rodgers, William  
Subject: VW Group: Request for Approval for an Alternate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

The Verify System is down, so if necessary, I will submit this through it when the system is working again.

The attachment is a request for approval of an alternate cooling fan for emission testing of the MY 2013 Lamborghini Aventador. Please see the attachment.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

[attachment "CBI\_DNLXV06.5L83\_RFA\_STP\_R00.PDF" deleted by Jim Snyder/AA/USEPA/US] [attachment  
"Lamborghini Aventador Fan Placement.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Thur 2/23/2012 1:07:31 PM  
**Subject:** RE: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Hi Jim,

We received a EPA test date for this vehicle of 3/21. As I mentioned in my voice message today, Is it possible to bump this back a week? I left a message last week requesting a change to our originally available date last week if possible.

Just to clarify Lamborghini requested a change in earliest delivery date to 3/22. Please let me know if there is a problem with changing date so I can follow up.

Sorry for the confusion.

Regards

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, February 21, 2012 7:02 PM  
To: Hart, Robert (VWoA)  
Cc: Giles, Michael; Rodgers, William  
Subject: Re: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Thank you , that is clearer.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 02/21/2012 07:32 AM  
Subject: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

# Ex. 4 - CBI

Regards  
A.Baraldi

Please let me know what, if anything, should be submitted through the Verify System.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Monday, February 13, 2012 1:28 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael; Rodgers, William  
Subject: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

The Verify System is down, so if necessary, I will submit this through it when the system is working again.

The attachment is a request for approval of an alternate cooling fan for emission testing of the MY 2013 Lamborghini Aventador. Please see the attachment.



Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

[attachment "CBI\_DNLXV06.5L83\_RFA\_STP\_R00.PDF" deleted by Jim Snyder/AA/USEPA/US] [attachment  
"Lamborghini Aventador Fan Placement.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** David Good/AA/USEPA/US@EPA;"Kata, Leonard" [Leonard.Kata@vw.com]; Kata, Leonard" [Leonard.Kata@vw.com]; Harris, Dale" [Dale.Harris@vw.com]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Thur 3/1/2012 2:21:57 PM  
**Subject:** 2011 Volkswagen Group NOx Fleet Average Credits  
[CBI\\_BVWX\\_COMMON\\_CR1\\_AB\\_T\\_R00.xlsx](#)  
[CBI\\_BVWX\\_COMMON\\_CR1\\_AB\\_T\\_R00.pdf](#)  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

Hello Jim;

Please find attached, the cover letter with spreadsheet printouts of the EPA NOx fleet average template as well as the Excel spreadsheet file. As it was stated in the letter the spreadsheet does not include the HLDLT volumes, but it is of little consequence because all models are certified to the 0.07 g/mi NOx standard or better. None of the HLDLT are certified better than 0.07 NOx. The total number of 2011 Volkswagen Group LDV/LLDT and HLDLT is 333,336 units. If you see anything that needs to be corrected please let me know. I will attempt to place the pdf file into Verify, if you can tell me where it goes.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 3/8/2012 4:51:12 PM  
**Subject:** VW Group - 2013 Audi Certification Requests  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I have submitted Initial Applications and Certification requests for the following 2013 Audi test groups.

The test group DAD XV02.03UA is a new LDV test group for 2013 and uses carry-across data from the 2012 LDV/LDT test group CADXJ02.03UA. This new 2013 test group no longer includes VW Tiguan (LDT1) models and some other VW models now being certified in Volkswagen test groups for 2013.

All other test groups listed are direct carry-overs from 2012.

DADXT03.0TLF – T2B5/ULEV carry-over

DAD XV02.03PA – T2B3/SULEV carry-over

DAD XV02.03UA – T2B5/ULEV new

All of these have normal start of production dates in week 22/2012, so no rush is necessary.

Please let me know if you have questions.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Sandra Somoza/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/8/2012 5:30:20 PM  
**Subject:** Re: VW Group: Investigation into Possible Manufacturer Profile Changes in Verify  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Robert,

I am forwarding your question to your certification rep Jim Snyder.

Sandra Somoza  
U.S. Environmental Protection Agency  
Office of Transportation and Air Quality  
Compliance Division  
734 214-4704  
[somoza.sandra@epa.gov](mailto:somoza.sandra@epa.gov)

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Sandra Somoza/AA/USEPA/US@EPA  
Cc: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
Date: 03/08/2012 11:52 AM  
Subject: VW Group: Investigation into Possible Manufacturer Profile Changes in Verify

Hello Sandra,

The Volkswagen Group is investigating the possibility of some changes in how it is listed in the Verify System.  
Bob Peavyhouse made a suggestion to Richard Thomas that has the potential to considerably simplify the our submission processing for CAFE and GHG.

This is only a preliminary investigation and we are not sure that we can even do it for reasons we have yet to discover.

Currently the Volkswagen Group consists of Volkswagen, Audi, Bentley, Lamborghini and Bugatti.  
Each of these manufacturers exist in Verify as a separate manufacturer with it's own login.

We are investigating the possibility of combining some or all of the five manufacturers under one entity – similar to other manufacturers (GM, Ford, Toyota, etc.) with more than one make.  
This would, in theory, reduce the magnitude of permissions we have to set up and any number of other things in Verify in order to share data between all five manufacturers.

We need to know if it is possible to set up a single manufacturer group in Verify using manufacturers that already exist in Verify as individual manufacturers.

We also need to know what the ramifications of doing that would be. Would that, for instance, change the manufacturer name on the certificates of conformity?

Is it possible to keep the individual manufacturer names on the related certificates of conformity? Any other things to consider?

If this is even possible, we will have to get agreement from each of the affected manufacturers before we can move ahead with it.

For now we are trying to get answers to the questions we know they will ask.

Any insight that you can provide will be greatly appreciated.

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Tue 3/13/2012 12:58:17 PM  
**Subject:** RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:[mailto:Snyder.Jim@epamail.epa.gov])  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Hi Jim,

Thanks for the quick response. I was able to get the cert request through this time. I also submitted a revised initial application with the new CSI.

Please review this application at your earliest convenience.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, March 12, 2012 4:18 PM  
To: Jim Snyder  
Cc: Giles, Michael  
Subject: RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Yes, they recommend putting in 9999.99 for standard

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: "Giles, Michael" <michael.giles@vw.com>  
Date: 03/12/2012 04:02 PM  
Subject: RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

For flex fuel, you only need to do the E10 evap tests.

For OCREE, I guess you need to put something higher in the methane and N2O limits. Either equal to your methane w/DF, or just 9999. I'll ask the Verify staff what they are typically recommending but they are in a meeting this afternoon.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA



Date: 03/12/2012 02:02 PM  
Subject: RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Hi Jim –

Besides the issue below, the methane test failed once DF was added . This prevented the cert request from processing.

Note, we (VW Group) are using opt-CREE. Our understanding is that methane (and N2O) standards only apply if when using CREE option.

Can you advise or call me to discuss.

Thanks,  
Mike

From: Giles, Michael  
Sent: Monday, March 12, 2012 1:33 PM  
To: 'Jim Snyder'  
Subject: RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Thanks for the follow up. I see that my cert request was rejected for failed tests. We are working on it now anyway ... so a good time to fix it.

I have a related question – for these flex fuel concepts, should we list gasoline evap tests in the CSI? I believe we only need to list the worst case (E10) tests, is this correct?

Thanks,  
Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, March 12, 2012 1:27 PM  
To: Giles, Michael  
Subject: Re: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Mike, I don't see it in the queue. Just the 3 Audi requests.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 03/07/2012 01:22 PM  
Subject: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Hello Jim,

We submitted a cert request for the Bentley test group DBEXV06.0501. This is for the Continental Flying Spur, Continental Supersports Convertible, Continental GT and GTC carlines.

Please note this is a carryover test group with no new vehicles tested. We would appreciate your review at your earliest convenience. Please call me if you have any questions on this request.

Regards,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Hart, Robert (VWoA)"  
**Sent:** Tue 3/13/2012 12:58:25 PM  
**Subject:** Investigation into possible changes for VW Group in the Verify System  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Hello Jim,

I need to have a brief discussion with you regarding the topic in an e-mail that I sent to Sandra Somoza that she forwarded to you.

We are investigating the possibility of reconfiguring the Volkswagen Group in the Verify System.

We are looking at consolidating some or all five of our manufacturers under one group to simplify our interaction with the Verify System.

We need to know any negative aspects of making this change.

This will require "buy in" from Audi, VW, Bentley, Lamborghini and Bugatti because the test group names will all have the same identifier and, unless I am wrong, the certificates will all come under the same group name. For instance, if a Volkswagen Group was created to contain all five manufacturers, then all certificates would come back as Volkswagen Group certificates.

This is the type of question that I need answers for. If it proves beneficial to do this, in order to "sell" it, I will need the answers to all of the questions that I know the group will ask.

I have not had any luck catching you at your desk. I have been trying to call you several times over the last few days without success. I did not leave any messages.

Please call me or let me know when it would be a good time for me to call you to discuss this.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 3/13/2012 3:45:56 PM  
**Subject:** VW Group - 4 Certificate Requests for the Audi 4.0L V8 Bi-turbo  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I have submitted the following Initial Application and Certificate Requests for the 2013 Audi test group DAD XV04.03UJ. I would greatly appreciate if you could expedite a Certificate of Conformity for this one, considering the start of production of April 16th for the Bentley models and needed time for ARB certification.

Evaporative Family DAD XR0155D4A represents the FEDV models Audi A8 and A8L with Stop Start technology. These FEDV tests are under way and will be forthcoming in the near future. All other EDV and FEDV tests for the test group have been submitted.

Test Group/Evap Family

DAD XV04.03UJ- DAD XR0130D61

DAD XV04.03UJ- DAD XR0155D4B

DAD XV04.03UJ- DAD XR0155D4A

DAD XV04.03UJ- DAD XR0140C7A

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** CN=Robert Peavyhouse/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]  
**From:** CN=David Good/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/13/2012 4:38:27 PM  
**Subject:** Re: Transmission Lock-Up Definitions in Verify  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Bob H,

Regarding your question about what should be entered for the lock-up field for CVT transmissions, for about 60% of the CVT transmissions in Verify, manufacturers have entered No (and about 40 % they entered Yes). for 2011-2013 data in Verify.

Use your own judgment on what to enter in VW/Audi's case-----but as Bob P said, please be consistent from Test group info to FE Label to CAFE data entry.

Dave

From: Robert Peavyhouse/AA/USEPA/US  
To: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Cc: David Good/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>  
Date: 03/13/2012 09:48 AM  
Subject: Re: Transmission Lock-Up Definitions in Verify

Bob,

From my standpoint (processing labels and CAFE), it doesn't really matter unless you have multiple models and the only difference is that one of them has lockup=yes, and the other lockup=no. The only thing that matters to the processing of the data is that you are consistent throughout the certification and labeling process.

However, Dave Good deals more with the fuel economy guide, and he does have a preferred way to keep things consistent between manufacturers. So I will defer to Dave to give you guidance on this issue.

The biggest problem I see is when a manufacturer lists a certified model in their test group one way, and then changes it when labeling. CAFE uses all of the data already entered in Label, so it really isn't a problem for CAFE other than this is where the inconsistency is currently flagged. We have a business rule in the works to keep this from happening in future labels, but it won't be in place until May 11th.

But as I mentioned, it doesn't matter to the processing as long as you are consistent.

Robert Peavyhouse  
Compliance Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814

fax: (734) 214-4053  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Robert Peavyhouse/AA/USEPA/US@EPA  
Cc: David Good/AA/USEPA/US@EPA, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
Date: 03/12/2012 11:44 AM  
Subject: Transmission Lock-Up Definitions in Verify

Hello Bob,

I had a discussion with Dave Good regarding automated manual transmissions and double clutch automatic transmissions.  
I believe we finally have the lock-up definition that has been plaguing Richard Thomas with the CAFE and GHG submissions nearly corrected in our system.

To recap:

Automated manual and double clutch (DSG) transmissions with a manual shift mode (by paddles or shift lever) will come under the new designation: "AMS" with Verify Release 10.

Lock-up refers to "transmission lock-up", not torque converter lock-up, for these transmissions and the answer is: "Y" (yes).

For MY 2012 and prior model years we will leave the DSG transmissions designated as Semi-Automatic (SA) and set the lock-up to "Y".

For our automated manual (AM) transmissions, the transmission lock-up is currently set to "N" (no). Should it be set to "Y"?

Currently, transmission lock-up for our CVT transmissions is set to "N".

Based on my understanding of the definition of "transmission lock-up", the answer for our CVT transmissions (no torque converter used) should be "Y". Is this true?

Let me know if the above is correct.

We will correct whatever is necessary based on your response.

I think, with these answers, this will finally end the confusion with this issue for us.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road



Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 3/14/2012 11:28:29 AM  
**Subject:** RE: VW Group - 4 Certificate Requests for the Audi 4.0L V8 Bi-turbo  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[Robert.Hart@vw.com](mailto:Robert.Hart@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks.

Mike Giles will address the 6.0L CSI. Perhaps it has cylinder deactivation so the 2.0L CSI would still apply....just a thought J

We are checking on the payment issue.

Bill

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, March 13, 2012 6:12 PM  
To: Rodgers, William  
Subject: Re: VW Group - 4 Certificate Requests for the Audi 4.0L V8 Bi-turbo

Bill, the cert application for the Bentley 6.0L has the wrong CSI in it. The CSI is from a 2.0L Jetta. I scanned the 4.0L Part one's CSI and didn't notice any issues.

Also, I don't see fee payment on the 3.0L Audi yet. I'll wait a few more days on that one.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 03/13/2012 11:46 AM  
Subject: VW Group - 4 Certificate Requests for the Audi 4.0L V8 Bi-turbo

Hello Jim,

I have submitted the following Initial Application and Certificate Requests for the 2013 Audi test group DAD XV04.03UJ. I would greatly appreciate if you could expedite a Certificate of Conformity for this one, considering the start of production of April 16th for the Bentley models and needed time for ARB certification.

Evaporative Family DAD XR0155D4A represents the FEDV models Audi A8 and A8L with Stop Start technology.

These FEDV tests are under way and will be forthcoming in the near future. All other EDV and FEDV tests for the test group have been submitted.

Test Group/Evap Family

DAD XV04.03UJ- DAD XR0130D61

DAD XV04.03UJ- DAD XR0155D4B

DAD XV04.03UJ- DAD XR0155D4A

DAD XV04.03UJ- DAD XR0140C7A

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Wed 3/14/2012 11:55:39 AM  
**Subject:** VW Group - Bentley 6.0L application correction

Hello Jim,

I corrected the Bentley Application which had the wrong CSI. Revision 02 (CBI and FOI) have been uploaded.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Wed 3/14/2012 12:47:56 PM  
**Subject:** FW: 2013 Audi Certification Fee Filing Forms  
[2013 EPA Cert Fees DADXT03.0TLF toEPA.pdf](#)  
[2013 EPA Cert Fees DADXJ03.03UF to EPA.pdf](#)  
[20120314084207633.pdf](#)  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

Jim,

The 3.0L payment was made February 24th. Please check with Willem VandenBroek.

Regards,

Bill

From: Thomas, Richard (EEO)  
Sent: Wednesday, March 14, 2012 8:39 AM  
To: EPA Certification Fee Filing Forms ([fees@epa.gov](mailto:fees@epa.gov))  
Cc: Rodgers, William; VandenBroek.Willem@epamail.epa.gov  
Subject: 2013 Audi Certification Fee Filing Forms

Please find attached two Audi test groups fee filings forms. Payment of \$65,356 was electronically made on February 24, 2012. If you have any questions please contact me directly.

Regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)





**U.S. ENVIRONMENTAL PROTECTION AGENCY  
MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM  
ON-HIGHWAY FEE FILING FORM**

**FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2012**

Manufacturer Name VOLKSWAGEN Group of America, Inc.

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48326

On-Highway Certification Request Type (check one)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$32,678) | <input type="checkbox"/> HDV EVAP-ONLY (\$511)      |
| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$16,899)           | <input type="checkbox"/> HDE CALIF-ONLY (\$511)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$42,506)                     | <input type="checkbox"/> MOTORCYCLE (\$1,210)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$53,639) |

EPA standard family or test group name:

D	A	D	X	T	0	3	.	0	T	L	F
---	---	---	---	---	---	---	---	---	---	---	---

Amount paid (U.S. Funds Only):

\$ 32,678.00

Enter the check number, or the statement "WIRE" or "ACH":

EFT

**Reduced Fee Section (40 CFR §1027.120)**

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/units covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


Company Representative: Richard Thomas

Signature:

Title: Emission Cert Strategist Phone/Fax: 248 754 4113 / 248 754 4207 Date: 02/14/2012

E-mail Address: Richard.Thomas@VW.com

**Submission of payments and forms:**

- (1) Online: **Forms** may be found and submitted with or without **payments** online at [www.Pay.gov](http://www.Pay.gov).
- (2) By mail: For check payments only, send **checks** and this **form** to:

**Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000**

- (3) Transmit offline **Wire payments** to the **New York Federal Reserve Bank**. (See Instructions, p.2)
- (4) Transmit offline **ACH payments** to the **Federal Reserve Bank of Cleveland**. (Instructions, p.2)
- (5) **Forms** not submitted under (1) and (2) above can be sent as email attachments to [Fees@epa.gov](mailto:Fees@epa.gov). Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

This form expires: 1/1/2013



**U.S. ENVIRONMENTAL PROTECTION AGENCY  
MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM  
ON-HIGHWAY FEE FILING FORM**

**FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2012**

Manufacturer Name VOLKSWAGEN Group of America, Inc.

Address 3800 Hamlin Road

City/State/Zip Code/Country Auburn Hills, MI 48326

On-Highway Certification Request Type (check one)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL (\$32,678) | <input type="checkbox"/> HDV EVAP-ONLY (\$511)      |
| <input type="checkbox"/> LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY (\$16,899)           | <input type="checkbox"/> HDE CALIF-ONLY (\$511)     |
| <input type="checkbox"/> HDE (Engine Dyno cert) FEDERAL (\$42,506)                     | <input type="checkbox"/> MOTORCYCLE (\$1,210)       |
|  | <input type="checkbox"/> LD/MDPV/HDV ICI (\$53,639) |

EPA standard family or test group name:

D	A	D	X	J	0	3	.	0	3	U	F
---	---	---	---	---	---	---	---	---	---	---	---

Amount paid (U.S. Funds Only):

\$ 32,678.00

Enter the check number, or the statement "WIRE" or "ACH":

EFT

**Reduced Fee Section (40 CFR §1027.120)**

Reduced fee calculation (minimum initial payment \$750): Total number of vehicles/units covered: \_\_\_\_\_

Aggregate retail sales price of the vehicles/units: \$ \_\_\_\_\_ x 1% = \$ \_\_\_\_\_

Check box if an Independent Commercial Importer: ☐ List the VIN of imported vehicles/engines below:


Company Representative: Richard Thomas

Signature:

Title: Emission Cert Strategist Phone/Fax: 248 754 4113 / 248 754 4207 Date: 02/14/2012

E-mail Address: Richard.Thomas@VW.com

**Submission of payments and forms:**

- (1) Online: **Forms** may be found and submitted with or without **payments** online at [www.Pay.gov](http://www.Pay.gov).  
(2) By mail: For check payments only, send **checks** and this **form** to:

**Environmental Protection Agency  
Motor Vehicle and Engine Compliance Program  
P.O. Box 979032  
St. Louis, MO 63197-9000**

- (3) Transmit offline Wire payments to the New York Federal Reserve Bank. (See Instructions, p.2)  
(4) Transmit offline ACH payments to the Federal Reserve Bank of Cleveland. (Instructions, p.2)  
(5) **Forms** not submitted under (1) and (2) above can be sent as email attachments to [Fees@epa.gov](mailto:Fees@epa.gov).  
Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

This form expires: 1/1/2013



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 3/15/2012 10:42:30 AM  
**Subject:** FW: Confirmation of Certification Fees Payment

Jim, FYI.

-----Original Message-----

From: Thomas, Richard (EEO)  
Sent: Wednesday, March 14, 2012 1:28 PM  
To: Rodgers, William  
Subject: FW: Confirmation of Certification Fees Payment

Paid !

-----Original Message-----

From: fees@epa.gov [mailto:fees@epa.gov]  
Sent: Wednesday, March 14, 2012 1:28 PM  
To: Thomas, Richard (EEO)  
Subject: Confirmation of Certification Fees Payment

To the representative for Audi:

Your certification Fee Filing Form(s) submitted for the following family or test group(s) and the associated financial documentation for your payment of \$65356.00 were received on 03/14/2012.

- DADXT03.OTLF

- DADXJ03.03UF

This message indicates only that EPA has received record of your payment and form(s) for the above certification fee. It does not constitute the granting of a Certificate of Conformity by EPA or convey any information about the status of your certification application for the subject family or test group(s).

Please do not respond to this email. If you have any questions regarding certification of the family or test group(s), please contact your EPA Certification Representative; for questions on fees, contact Fees@epa.gov.

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard" [Leonard.Kata@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 3/15/2012 2:53:25 PM  
**Subject:** Audi 4.0L V8 Description - Test Group DAD XV04.03UJ  
[Pages from SSP607 WG DE.pdf](#)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[image002.png](#)

Hello Jim,

I received some information regarding the following questions you posed to me yesterday during our phone conversation:

- 1) Is the Start-stop function controlled by brake pedal switch activation or brake hydraulic pressure, other?

Answer:

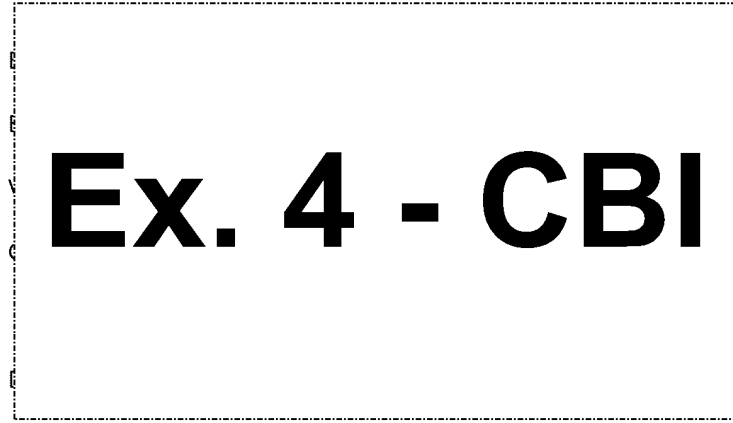
**Ex. 4 - CBI**

- 2) Please provide diagrams or presentation on Audi Cylinder Deactivation explaining the design and function.

Answer:

**Ex. 4 - CBI**

Operating Conditions:



Please let me know if you have further questions.

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 3/19/2012 5:32:35 PM  
**Subject:** VW Group - Decision Information VID: AU641 10375/13  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I Have uploaded a Decision Information to Verify for the following test group and VID. This is for the 2013 Audi A8L equipped with our VW-designed W12 engine.

The tests represent an increased ETW to 5,250, from 5,000 in 2012, due to the addition of rear A/C in the passenger compartment. The final drive was also changed to optimize MPG but no new technology is included.

Test group: DVWXV06.3UA8

VID: AU641 10375/13

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 3/21/2012 5:50:57 PM  
**Subject:** VW Group - Decision Information for test group DADXJ03.03UF  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I have submitted the following Decision Information to Verify for your consideration. This test vehicle was tested in both Start-stop modes; Stop-start activated (VID Config-0) and deactivated (VID Config-1). As the result, we plan to average the tests for fuel economy. The Configuration-0 represents the worst case EDV for the test group, Audi A8 3.0L V6 (supercharged) with Stop-start activated.

Evaporative testing was also performed on Configuration-0 as the result of a new Evap. Family which now uses a small in-line bleed canister.

Please let me know if you have any questions.

Test Group: DADXJ03.03UF

Evap. Family: DADXR0155D4A

VID: D3UF-DAQ Configuration-0

VID: D3UF-DAQ Configuration-1

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Thur 3/22/2012 6:13:08 PM  
**Subject:** VW Group - questions about DF's

Hello Jim,

Could you confirm that for the new EPA assigned ADF's (CD-12-07), that we should still use the listed NMOG values as DF's for NMHC and methane?

On a related note, I understand that starting with MY14 we will no longer be able to use NMOG DF's for methane. If so, would carryover test groups be exempt from this requirement?

Thanks

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Mon 3/26/2012 12:02:35 PM  
**Subject:** VW Group - Bugatti Test Group DBGTV08.0V16

Hello Jim,

Today we submitted our certification request for Bugatti Test Group DBGTV08.0V16. This is a carryover test group, with EPA assigned DF's. Please note, these values were changed to the new additive values per EPA's latest guidance letter CD-12-07. So the certification values on the CSI will be slightly different.

Please let me know if any questions arise on review of this request.

Regards,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

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FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Kata, Leonard"  
[Leonard.Kata@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 3/26/2012 6:28:08 PM  
**Subject:** VW Group - Conditional Certificate Request for Test Grp DADXJ03.03UF  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I have submitted the following Certificate Requests for the Audi Test Group DADXJ03.03UF, Audi A8 (start-stop) and S-models with 3.0L TFSI V6. The A8 requires a conditional Certificate due to the short lead time before planned production start-up and pending EPA confirmatory tests. It would be great if we could get these approved by the end of this week, Mar. 30th .

Test Grp/Evap Family

DADXJ03.03UF-DADXR0155D4A - conditional

DADXJ03.03UF-DADXR0140B8A

Thanks,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

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office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Mon 3/26/2012 6:43:45 PM  
**Subject:** VW Group - Wednesday testing information

Hi Jim,

Just a follow up to my voice message:

As you know we have two vehicles scheduled to begin testing at EPA on Wednesday (a Volkswagen and a Lamborghini.).

I am planning to be there Wednesday to witness the start of both tests if possible. For the VW test, we also have an engineer from Germany (Tobias Glas) who is planning to be there. For Lamborghini, there are 4 other engineers. I understand that there are usually limits to the number of witnesses, but would like to see if that is a hard rule in the case of the Lamborghini as they have requested I be there if possible.

Some other information about the Lamborghini: During the testing over the last week, there was some wheel slip which occurred during the US06 test, making it difficult to maintain the trace. We think this may have something to do with the rollers, because they did not seem to have this issue at their dyno. We just want to let you know about this in case the same thing happens at EPA.

Also, would it be possible for us to meet briefly, and possibly get a small tour of the testing facilities?

Lastly, if you could forward a testing schedule when it is available, it would be appreciated.

Please call me if you have any questions.

Thanks,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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3800 Hamlin Road

Auburn Hills, MI 48326

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FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Tue 3/27/2012 1:18:48 PM  
**Subject:** VW Group - Lamborghini follow up

Hello Jim,

Just to follow up on a couple open points,

For the production vehicles, there will be a button to disable start-stop. But for the test vehicle, we do not have this button since it was decided that we were only doing confirmatory testing in active mode.

Also, there is in fact brake pressure activation. However we are told it is "minimal". So, it might not be apparent to the driver compared to an Audi system.

Hope this helps,

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

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Auburn Hills, MI 48326

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 3/27/2012 3:41:26 PM  
**Subject:** VW Group - Confirmatory tests for Audi A8 VID D3UF-DAQ  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I have submitted the Confirmatory test Supplemental Information for the VID D3UF-DAQ (A8 3.0L TFSI V6), Configuration 0 and Configuration 1

I have also changed the vehicle availability date in the Decision Information to April 30, 2012.

Please proceed with scheduling these tests and let me know as soon as possible if April 30th is acceptable.

Regards,

Bill Rodgers

Emissions Certification Engineer

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)



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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Tue 3/27/2012 5:00:38 PM  
**Subject:** RE: VW Group - Lamborghini follow up  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)

Hi Jim,

Yes, engine bonnet open is good.

Thanks,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, March 27, 2012 12:32 PM  
To: Giles, Michael  
Subject: Re: VW Group - Lamborghini follow up

Can you also verify the engine bonnet position? We normally test with it open unless requested otherwise.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/27/2012 09:18 AM  
Subject: VW Group - Lamborghini follow up

Hello Jim,

Just to follow up on a couple open points,

For the production vehicles, there will be a button to disable start-stop. But for the test vehicle, we do not have this button since it was decided that we were only doing confirmatory testing in active mode.

Also, there is in fact brake pressure activation. However we are told it is "minimal". So, it might not be apparent to the driver compared to an Audi system.

Hope this helps,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
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3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 3/27/2012 9:09:54 PM  
**Subject:** VW Group - Decision Information for VID D3UF-BMQ and D3UF-BAQ  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted Decision Information for the follow test group and VID's. These represent FEDV models for this 3.0L TFSI V6 test group with No Start-stop technology. No new technology is included. Please let me know if you have any questions.

Test Group: DADXJ03.03UF

FEDV

VID: D3UF-BMQ, Configuration-0 (S5 Coupe with manual trans.)

VID: D3UF-BAQ , Configuration-0 (S4 Sedan/S5 Coupe with automatic trans.)

VID: D3UF-BAQ, Configuration-1 (S4 Sedan /S5 Coupe with automatic trans.)

Regards,

Bill Rodgers

Emissions Certification Engineer

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william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 3/28/2012 7:21:17 PM  
**Subject:** VW Group - Decision Information Audi 4.2L V8 (VID D3UL-BSQ)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Jim,

I submitted tests and Decision Information for the following test group and vehicles:

These tests represent 2013 Audi RS5 Coupe and RS5 Cabriolet models with a hi-performance 4.2L V8 (naturally aspirated). No new technology is involved. Manufacturer confirmatory FTP and HWY tests are required for Configuration-0 being a potential Gas Guzzler.

Please let me know your decision as soon as possible so we can plan accordingly.

Test Group: DAD XV04.23UL

D3UL-BSQ, Configuration 0 (EDV – RS5 Cabriolet)

D3UL-BSQ, Configuration 1 (RS5 Coupe)

Thanks,

Bill Rodgers

Emissions Certification Engineer

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fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 3/29/2012 11:39:45 AM  
**Subject:** VW Group - Decision Information for Audi A8 4.0T VID D3UJ-DAQ  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted the Decision Information for the 2013 Audi A8/A8L 4.0T V8 with Cyl. Deactivation and Start-stop. This is the vehicle we discussed that you were interested in confirming. A manufacturer confirmatory HWY test is required should it be waived.

Please let us know as soon as possible what your decision is.

Test Group: DAD XV04.03UJ

VID: D3UJ-DAQ, Configuration-0

Thanks,

Bill Rodgers

Emissions Certification Engineer

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Thur 3/29/2012 11:45:55 AM  
**Subject:** RE: VW confirmatory results  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Thanks Jim!

Regards,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, March 28, 2012 4:30 PM  
To: Giles, Michael  
Cc: Vincent Mazaitis  
Subject: VW confirmatory results

Mike, here's the data. Its also in Verify. Don't get too used to this fast turnaround, its not typical.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Giles, Michael"  
**Sent:** Thur 3/29/2012 2:58:05 PM  
**Subject:** RE: Lamborghini Laboratory Test Data  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Thanks Jim,

Lamborghini is reviewing the data, if they feel it is necessary we might call to discuss.

Could you double check that the lab guys have kept the fuel drain hose with the vehicle? I think we just put it on the seat for the transport.

Thanks

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, March 29, 2012 10:03 AM  
To: Giles, Michael  
Subject: Fw: Lamborghini Laboratory Test Data

Mike , here's the Lambo data. Passes but FE is off. We can talk after you've looked it over.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
----- Forwarded by Jim Snyder/AA/USEPA/US on 03/29/2012 10:01 AM -----

From: Vincent Mazaitis/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/29/2012 06:58 AM  
Subject: Lamborghini Laboratory Test Data

Jim,

Official results are in Verify.

Vince Mazaitis

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Thur 3/29/2012 5:05:11 PM  
**Subject:** VW Group - Decision Information VID D3UJ-S7Q

Hello Jim,

I submitted Tests and Decision Information for the following test group and VIDs representing new 4.0L TFSI V8 FEDVs. Manufacturer Confirmatory tests for both configurations are required due to high fuel economy for the ETW.

Test Group: DAD XV04.03UJ

D3UJ-S7Q, Configuration 0 (Audi S7 – No Start-stop)

D3UJ-S7Q, Configuration 1 (Audi S6 – No Start-stop)

**To:** Jim Snyder/AA/USEPA/US@EPA;Vincent Mazaitis/AA/USEPA/US@EPA[]; incent Mazaitis/AA/USEPA/US@EPA[]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Thur 3/29/2012 6:30:14 PM  
**Subject:** RE: Lamborghini Laboratory Test Data  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Hi Jim and Vincent,

Lamborghini is \*not\* requesting a re-test. Therefore, we would like to know when the vehicle can be released. We will be making the transportation arrangements soon. Please advise.

Lastly, thanks again for your help and the tour yesterday, it was appreciated by all.

Regards

Mike

Michael Giles

Certification Specialist

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

United States of America

Phone +1-248-754-4229

FAX +1-248-754-4207

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, March 29, 2012 10:03 AM  
To: Giles, Michael  
Subject: Fw: Lamborghini Laboratory Test Data

Mike , here's the Lambo data. Passes but FE is off. We can talk after you've looked it over.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

----- Forwarded by Jim Snyder/AA/USEPA/US on 03/29/2012 10:01 AM -----

From: Vincent Mazaitis/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/29/2012 06:58 AM  
Subject: Lamborghini Laboratory Test Data

Jim,

Official results are in Verify.

Vince Mazaitis

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**From:** "Giles, Michael"  
**Sent:** Thur 3/29/2012 7:02:25 PM  
**Subject:** RE: VW confirmatory results  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Jim,

This one is still in discussion, we hope to let you know tomorrow.

Thanks,

Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, March 29, 2012 2:56 PM  
To: Giles, Michael  
Subject: RE: VW confirmatory results

Any word on the Audi "Beetle" ? Should I reschedule a hwy and US06 or will accept initial results?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/29/2012 07:45 AM  
Subject: RE: VW confirmatory results



Thanks Jim!

Regards,  
Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, March 28, 2012 4:30 PM  
To: Giles, Michael  
Cc: Vincent Mazaitis  
Subject: VW confirmatory results

Mike, here's the data. Its also in Verify. Don't get too used to this fast turnaround, its not typical.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 4/2/2012 12:49:03 PM  
**Subject:** VW Group - Eos Release VID CAD-3UA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

We will accept the tests that were performed last week on the VW Eos VID CAD-3UA. Please release the vehicle for pick up.

Regards,

Bill Rodgers

Emissions Certification Engineer

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA;"Giles, Michael" [michael.giles@vw.com];  
Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Mon 4/2/2012 1:25:47 PM  
**Subject:** RE: VW Group - Eos Release VID CAD-3UA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim/Vince,

We have confirmed that we will pick up both the Lamborghini Aventador and VW Eos test vehicles today.  
Please provide Security with the keys for our driver.

Regards,

Bill Rodgers

Emissions Certification Engineer

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office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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From: Rodgers, William  
Sent: Monday, April 02, 2012 8:49 AM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Cc: Mazaitis.Vincent@epamail.epa.gov  
Subject: VW Group - Eos Release VID CAD-3UA

Hello Jim,

We will accept the tests that were performed last week on the VW Eos VID CAD-3UA. Please release the vehicle for pick up.

Regards,

Bill Rodgers

Emissions Certification Engineer

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william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Mon 4/2/2012 6:09:02 PM  
**Subject:** VW Group - Supplemental Information for VID D3UJ-DAQ  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Jim,

I submitted the SI for the Audi A8 4.0T, VID D3UJ-DAQ. Please proceed with scheduling the test for May 9 if possible. This will help us coordinate with the other Audi test (VID D3UF-DAQ) we have scheduled that day. Please let me know as soon as possible given the short time for vehicle shipping.

Thanks,

Bill Rodgers

Emissions Certification Engineer

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Engineering and Environmental Office

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Tue 4/3/2012 4:43:48 PM  
**Subject:** VW Group - Decision Information Submissions For Audi 2.0L TFSI Test Group DAD XV02.03UB  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

I submitted to VERIFY the Tests and Decision Information for the following Vehicle IDs in the gasoline fueled test group DAD XV02.03UB.

I included the comments from our Input xml files. Note, the VERIFY system is stripping out the comments when it generates our Report xml files.

These tests are for the same 2.0L TFSI models as 2012, but with new software and tests to optimize fuel economy. Please let me know if you have questions.

di-DFUB-BAQ,\_Configuration-0

This represents the 2013 Audi A4 Sedan quattro / A5 Coupe quattro as FEDV models. No new technology exists. Manuf. Confirmatory tests for FTP/HWY are required for high MPG for the ETA

di-DFUB-BAQ,\_Configuration-1

This represents the 2013 Audi A5 Cabrio quattro as the worst case EDV for this test group. No new technology exists. Manuf. Confirmatory tests for FTP/HWY are required for high MPG for the ETA

di-DFUB-BAA,\_Configuration-0

Represents 2013 Audi A4 allroad quattro as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

di-D3UB-BMQ,\_Configuration-0

Represents 2013 Audi A4 quattro with manual transmission as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

di-D3UB-BMQ,\_Configuration-1

Represents 2013 Audi A5 Coupe quattro with manual transmission as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

di-D3UB-BAF,\_Configuration-0

Represents 2013 Audi A4 FWD with CVT trans as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

di-D3UB-BAF,\_Configuration-1

Represents 2013 Audi A5 Cabrio FWD with CVT trans as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

Regards,

Bill Rodgers

Emissions Certification Engineer

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[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**Cc:** "Kata, Leonard" [Leonard.Kata@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**From:** "Rodgers, William"  
**Sent:** Wed 4/4/2012 1:09:15 PM  
**Subject:** VW Group - Audi A8 Test Drive  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hello Jim,

We would like to schedule time at your facility on Tuesday afternoon May 8th to allow you and EPA staff to test drive a 2013 Audi A8 4.0L V8 equipped with Start-Stop and Cylinder Deactivation technologies. We plan to have Audi Engineers available during the time of the test drives to answer any questions that you or other staff may have. Please let us know if this date is acceptable and what block of time will work best for you. As you know, Audi representatives will already be at EPA for confirmatory testing the morning of May 8 and 9th so either afternoon is acceptable for us. An alternative might be Monday May 7th after we deliver the test vehicle but the fore mentioned dates are preferred.

Regards,

Bill Rodgers

Emissions Certification Engineer

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fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

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**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Thomas, Richard (EEO)"  
**Sent:** Wed 4/11/2012 3:27:25 PM  
**Subject:** RE: 3.0L A8 timing  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Hi Jim;

Thanks for checking but, I spoke with Germany this morning and they have to stay with the current schedule. We hope to deliver the car on Monday, April 30th with first test scheduled for May 2nd.

Best regards,

Richard E. Thomas  
VOLKSWAGEN Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Engineering and Environmental Office (EEO)  
Phone: 248 754-4213  
Fax: 248 754-4207  
[Richard.Thomas@VW.com](mailto:Richard.Thomas@VW.com)

From: Jim Snyder [<mailto:Snyder.Jim@epamail.epa.gov>]  
Sent: Wednesday, April 11, 2012 10:06 AM  
To: Thomas, Richard (EEO)  
Subject: 3.0L A8 timing

I talked to Ben Haynes in the lab and he is willing to consider moving up the 3.0L A8 if you give us some idea of when it could be available.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Thur 4/12/2012 10:45:44 AM  
**Subject:** RE: VW Group - Certificate Requests for Audi 2.0L TFSI  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[mailto:Snyder.Jim@epamail.epa.gov](mailto:mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Very good. Thanks for the help.

Bill

From: Jim Snyder [<mailto:Snyder.Jim@epamail.epa.gov>]  
Sent: Wednesday, April 11, 2012 5:10 PM  
To: Rodgers, William  
Subject: RE: VW Group - Certificate Requests for Audi 2.0L TFSI

I'll try for thurs if I get time , if not, then monday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <[michael.giles@vw.com](mailto:michael.giles@vw.com)>  
Date: 04/11/2012 12:59 PM  
Subject: RE: VW Group - Certificate Requests for Audi 2.0L TFSI

Yes the Audi application is a higher priority now.  
Thanks,  
Bill

From: Jim Snyder [<mailto:Snyder.Jim@epamail.epa.gov>]

Sent: Wednesday, April 11, 2012 12:21 PM  
To: Rodgers, William  
Subject: RE: VW Group - Certificate Requests for Audi 2.0L TFSI

I was working on the Bugatti cert. Would you prefer I focus on the Audis instead?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 04/11/2012 11:36 AM  
Subject: RE: VW Group - Certificate Requests for Audi 2.0L TFSI

Hi Jim,  
Is there any possibility to get the certificates requested on April 5th for test group DAD XV02.03UB by early next week?

We've got a small dealer demo fleet that the Sales Dept. wants to release to dealers earlier than expected.

Thanks,  
Bill

From: Rodgers, William  
Sent: Thursday, April 05, 2012 4:26 PM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Subject: VW Group - Certificate Requests for Audi 2.0L TFSI

Hi Jim,  
I submitted the Initial Application and following Certificate Requests for the Audi 2.0L TFSI (non-FFV) Test Group DAD XV02.03UB. I erroneously indicated a conditional certificate for the evaporative family 140C7A, when in fact it uses carryover test data from 2012.

cert\_request\_DAD XV02.03UB\_DAD XR0140B8A – conditional pending manufacturer confirmatory tests for high fuel economy.

cert\_request\_DAD XV02.03UB\_DAD XR0140C7A

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** Jim Snyder/AA/USEPA/US@EPA[]  
**From:** "Rodgers, William"  
**Sent:** Fri 4/13/2012 7:01:48 PM  
**Subject:** FW: Certificate DAD XV02.03UB-011 with Evap Family DADXR0140B8A has been issued

Hello Jim,

Thanks for pushing these Audi 2.0L certificates through on short notice.

To answer your phone message question regarding why they were requested as conditional, I requested them as conditional only because we have not yet completed the Manufacturer Confirmatory tests, required due to high fuel economy for the ETW. After I thought about it, perhaps a conditional certificate is not necessary since we are only confirming fuel economy and not emissions. What is correct on that?

Bill

-----Original Message-----

From: no-reply@epa.gov [mailto:no-reply@epa.gov]  
Sent: Friday, April 13, 2012 8:16 AM  
To: Rodgers, William; Giles, Michael; Hart, Robert (VWoA); VWoA EEO Government  
Subject: Certificate DAD XV02.03UB-011 with Evap Family DADXR0140B8A has been issued

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

Certificate Number DAD XV02.03UB-011 with Evaporative Family DADXR0140B8A has been issued. A copy of the signed certificate is attached below.

The Verify submission this message relates to has the following values:

Test Group Name: DAD XV02.03UB

The following transaction identifier has been assigned to this request:

\_191c9fe0-55ab-4cae-b00c-3b33b1a2bcca

Please do not reply to this message.

---

Certificate Number DAD XV02.03UB-010 with Evaporative Family DADXR0140C7A has been issued. A copy of the signed certificate is attached below.

The Verify submission this message relates to has the following values:

Test Group Name: DAD XV02.03UB

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 2/6/2012 11:32:28 PM  
**Subject:** Re: VW Group - Lamborghini Start-Stop Questions  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

I will be gone the rest of the week so call Steve Healy if any questions. x4121

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William" <William.Rodgers@vw.com>  
**Cc:** "Giles, Michael" <michael.giles@vw.com>  
**Date:** 02/06/2012 06:27 PM  
**Subject:** Re: VW Group - Lamborghini Start-Stop Questions

Since the default is enabled, it resets to enabled, and its a low volume Lamborghini, I don't see a need to test with it disabled. If this was a more typical volume vehicle I would first require more info on the enablement parameters and that you to bring a sample vehicle for us to evaluate (like the Audis).

I would still like a list from them of the parameters and settings that enable/disable the feature.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>  
**Date:** 02/06/2012 08:52 AM  
**Subject:** VW Group - Lamborghini Start-Stop Questions

Hello Jim,  
Mike Giles is out today so I am forwarding this information in reply to your questions regarding the

Lamborghini Aventador with Start&Stop technology, test group DNLXV06.5L83.

We have confirmed the following:

- 1) Production vehicles will have a button to deactivate/activate the Start&Stop operation on the driver command.
- 2) The strategy is DEFAULT ON (i.e. every time you start the engine, the Start&Stop system is enabled, independently on the status at key off).
- 3) The test vehicle is a pre-production unit and does not have the button installed, it is instead programmed to remain in Start&Stop ON mode. This is based on the expectation that tests are to be performed in that mode. If you chose to confirm this vehicle, please let us know if it is vital that a driver activated switch be installed in the test vehicle?

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 2/14/2012 12:09:23 AM  
**Subject:** Re: VW Group - 2.5L Certificate Requests  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks for the explanation Bill. I just got back today and I'm pretty buried so its good to know they are time critical.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 02/08/2012 10:36 AM  
**Subject:** VW Group - 2.5L Certificate Requests

Hello Jim,  
I've submitted 8 Certificate Requests covering the (4) 2013 Volkswagen 2.5L test groups listed below.  
There is no rush on these considering the market introduction date is June.

These requests are all carryovers based on 2012 test groups with no new tests or technical changes. The only difference from 2012 is that we chose to separate them into 4 (transmission specific) test groups for 2013, i.e., 2 for automatic models and 2 for manual models. This was done for (MSAT) Cold NMHC Standard purposes. See below:

2012 Test Grp	2013 Test Grp	2013 Test Group Standard Cold NMHC
	DVWXV02.5A59 Auto.	0.40
CVWXV02.5259	DVWXV02.5M59 Man.	0.30
	DVWXV02.5U3A Auto.	0.40
CVWXV02.5U35	DVWXV02.5U3M Man.	0.30

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office



3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 2/22/2012 12:01:43 AM  
**Subject:** Re: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador  
[Lambo alternate fan approval.pdf](#)  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Thank you , that is clearer.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 02/21/2012 07:32 AM  
Subject: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

# Ex. 4 - CBI

Regards  
A.Baraldi

Please let me know what, if anything, should be submitted through the Verify System.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Monday, February 13, 2012 1:28 PM  
To: Jim Snyder ([Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov))

Cc: Giles, Michael; Rodgers, William

Subject: VW Group: Request for Approval for an Alternate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

The Verify System is down, so if necessary, I will submit this through it when the system is working again.

The attachment is a request for approval of an alternate cooling fan for emission testing of the MY 2013 Lamborghini Aventador. Please see the attachment.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

[attachment "CBI\_DNLXV06.5L83\_RFA\_STP\_R00.PDF" deleted by Jim Snyder/AA/USEPA/US] [attachment "Lamborghini Aventador Fan Placement.pdf" deleted by Jim Snyder/AA/USEPA/US]

# VOLKSWAGEN

GROUP OF AMERICA

Mr. Jim Snyder  
Compliance and Innovative Strategies Division  
Office of Mobile Sources  
U. S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Leonard W. Kata Name  
Manager Title  
EEO Department  
248-754-4204 Phone  
248-754-4207 Fax  
leonard.kata@vw.com E-Mail

February 13, 2012 Date

Subject: Approval Request for Alternate Cooling Fan Placement for Emissions  
Testing for the MY 2013 Lamborghini Aventador

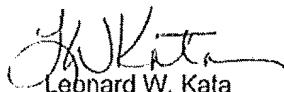
Dear Mr. Snyder,

We submit, on behalf of Automobili Lamborghini SpA, a request for approval of an alternate cooling fan placement for emission testing of the Lamborghini Aventador due to the unique configuration of the vehicle.

A diagram and explanation of the details is attached.

If you have any questions with regard to this request please contact our office in Auburn Hills at (248) 754-4229 or 754-4219.

Sincerely,



Leonard W. Kata  
Volkswagen Group of America, Inc.

REVIEWED AND ACCEPTED  
DATE 2/22/12 EPA REP [Signature]

Engineering and Environmental Office

Enclosure(s)

VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 HAMLEN ROAD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

**Ex. 4 - CBI**

**Ex. 4 - CBI**

# Ex. 4 - CBI

**Ex. 4 - CBI**

**Ex. 4 - CBI**

# **Ex. 4 - CBI**





**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 2/23/2012 1:41:07 PM  
**Subject:** RE: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador  
[robert.hart@vw.com](mailto:robert.hart@vw.com)

Sorry, I thought that got revised . I just called Ben and asked him to push it back a week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Giles, Michael" <michael.giles@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 02/23/2012 08:07 AM  
**Subject:** RE: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hi Jim,

We received a EPA test date for this vehicle of 3/21. As I mentioned in my voice message today, Is it possible to bump this back a week? I left a message last week requesting a change to our originally available date last week if possible.

Just to clarify Lamborghini requested a change in earliest delivery date to 3/22. Please let me know if there is a problem with changing date so I can follow up.

Sorry for the confusion.

Regards  
Mike

**From:** Jim Snyder [mailto:[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)]  
**Sent:** Tuesday, February 21, 2012 7:02 PM  
**To:** Hart, Robert (VWoA)  
**Cc:** Giles, Michael; Rodgers, William  
**Subject:** Re: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Thank you , that is clearer.  
Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 02/21/2012 07:32 AM  
Subject: FW: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

# Ex. 4 - CBI

Regards  
A.Baraldi

Please let me know what, if anything, should be submitted through the Verify System.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Monday, February 13, 2012 1:28 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael; Rodgers, William  
Subject: VW Group: Request for Approval for an Altenate Cooling Fan for Emission Testing for the MY 2013 Lamborghini Aventador

Hello Jim,

The Verify System is down, so if necessary, I will submit this through it when the system is working again.

The attachment is a request for approval of an alternate cooling fan for emission testing of the MY 2013 Lamborghini Aventador. Please see the attachment.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com

[attachment "CBI\_DNLXV06.5L83\_RFA\_STP\_R00.PDF" deleted by Jim Snyder/AA/USEPA/US] [attachment "Lamborghini Aventador Fan Placement.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 3/12/2012 5:26:42 PM  
**Subject:** Re: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Mike, I don't see it in the queue. Just the 3 Audi requests.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 03/07/2012 01:22 PM  
Subject: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Hello Jim,

We submitted a cert request for the Bentley test group DBEXV06.0501. This is for the Continental Flying Spur, Continental Supersports Convertible, Continental GT and GTC carlines.

Please note this is a carryover test group with no new vehicles tested. We would appreciate your review at your earliest convenience. Please call me if you have any questions on this request.

Regards,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 3/12/2012 8:18:11 PM  
**Subject:** RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Yes, they recommend putting in 9999.99 for standard

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Giles, Michael" <michael.giles@vw.com>  
**Date:** 03/12/2012 04:02 PM  
**Subject:** RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

For flex fuel, you only need to do the E10 evap tests.

For OCREE, I guess you need to put something higher in the methane and N2O limits. Either equal to your methane w/DF, or just 9999. I'll ask the Verify staff what they are typically recommending but they are in a meeting this afternoon.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Giles, Michael" <michael.giles@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 03/12/2012 02:02 PM  
**Subject:** RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Hi Jim –

Besides the issue below, the methane test failed once DF was added . This prevented the cert request from processing.

Note, we (VW Group) are using opt-CREE. Our understanding is that methane (and N2O) standards only apply if when using CREE option.

Can you advise or call me to discuss.

Thanks,  
Mike

From: Giles, Michael  
Sent: Monday, March 12, 2012 1:33 PM  
To: 'Jim Snyder'  
Subject: RE: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Thanks for the follow up. I see that my cert request was rejected for failed tests. We are working on it now anyway ... so a good time to fix it.

I have a related question – for these flex fuel concepts, should we list gasoline evap tests in the CSI? I believe we only need to list the worst case (E10) tests, is this correct?

Thanks,  
Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, March 12, 2012 1:27 PM  
To: Giles, Michael  
Subject: Re: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Mike, I don't see it in the queue. Just the 3 Audi requests.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 03/07/2012 01:22 PM  
Subject: VW Group - Request for Certificate for Bentley Test Group DBEX06.0501

Hello Jim,

We submitted a cert request for the Bentley tets group DBEXV06.0501. This is for the Continental Flying Spur, Continental Supersports Convertible, Continental GT and GTC carlines.

Please note this is a carryover test group with no new vehicles tested. We would appreciate your reviewl at your earliest convenience. Please call me if you have any questions on this request.

Regards,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207



**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/13/2012 10:12:21 PM  
**Subject:** Re: VW Group - 4 Certificate Requests for the Audi 4.0L V8 Bi-turbo  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Bill, the cert application for the Bentley 6.0L has the wrong CSI in it. The CSI is from a 2.0L Jetta. I scanned the 4.0L Part one's CSI and didn't notice any issues.

Also, I don't see fee payment on the 3.0L Audi yet. I'll wait a few more days on that one.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>, "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**Date:** 03/13/2012 11:46 AM  
**Subject:** VW Group - 4 Certificate Requests for the Audi 4.0L V8 Bi-turbo

Hello Jim,  
I have submitted the following Initial Application and Certificate Requests for the 2013 Audi test group DAD XV04.03UJ. I would greatly appreciate if you could expedite a Certificate of Conformity for this one, considering the start of production of April 16th for the Bentley models and needed time for ARB certification.

Evaporative Family DADXR0155D4A represents the FEDV models Audi A8 and A8L with Stop Start technology. These FEDV tests are under way and will be forthcoming in the near future. All other EDV and FEDV tests for the test group have been submitted.

Test Group/Evap Family  
DAD XV04.03UJ- DADXR0130D61  
DAD XV04.03UJ- DADXR0155D4B  
DAD XV04.03UJ- DADXR0155D4A  
DAD XV04.03UJ- DADXR0140C7A

Thanks,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 3/26/2012 8:42:59 PM  
**Subject:** Re: VW Group - Wednesday testing information

Mike, I forgot to give you Vince Mazaitis' phone number. He supports all our group's lab testing that we do. He starts early so you should ask for him when you and the others get here wednesday. He's at 214-4864.

Also, I assume they showed Ben how to start and drive the car when they dropped it off, but they didn't mention to him about the start/stop feature. I assume this is transparent to the driver?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 03/26/2012 02:43 PM  
Subject: VW Group - Wednesday testing information

Hi Jim,

Just a follow up to my voice message:

As you know we have two vehicles scheduled to begin testing at EPA on Wednesday (a Volkswagen and a Lamborghini.).

I am planning to be there Wednesday to witness the start of both tests if possible. For the VW test, we also have an engineer from Germany (Tobias Glas) who is planning to be there. For Lamborghini, there are 4 other engineers. I understand that there are usually limits to the number of witnesses, but would like to see if that is a hard rule in the case of the Lamborghini as they have requested I be there if possible.

Some other information about the Lamborghini: During the testing over the last week, there was some wheel slip which occurred during the US06 test, making it difficult to maintain the trace. We think this may have something to do with the rollers, because they did not seem to have this issue at their dyno. We just want to let you know about this in case the same thing happens at EPA.

Also, would it be possible for us to meet briefly, and possible get a small tour of the testing facilities?

Lastly, if you could forward a testing schedule when it is available, it would be appreciated.

Please call me if you have any questions.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/27/2012 4:31:45 PM  
**Subject:** Re: VW Group - Lamborghini follow up

Can you also verify the engine bonnet position? We normally test with it open unless requested otherwise.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/27/2012 09:18 AM  
Subject: VW Group - Lamborghini follow up

Hello Jim,

Just to follow up on a couple open points,

For the production vehicles, there will be a button to disable start-stop. But for the test vehicle, we do not have this button since it was decided that we were only doing confirmatory testing in active mode.

Also, there is in fact brake pressure activation. However we are told it is "minimal". So, it might not be apparent to the driver compared to an Audi system.

Hope this helps,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/27/2012 8:02:39 PM  
**Subject:** Message on GHG early credit reports

Early Credits Report Due March 30, 2012

We wish to remind manufacturers that reports that detail participation in the optional early CO2 credit programs under EPA's light-duty vehicle greenhouse gas regulations are due no later than 90 days after the end of the 2011 model year (see 40 CFR 86.1867-12(e)). For most manufacturers, this means that the required reports must be submitted to EPA by Friday, March 30, 2012. See 40 CFR 86.1867-12(e) for the specific reporting requirements, but please note that the general stated requirement is that the report contain "all information necessary for the calculation of the manufacturer's early credits in each of the 2009 through 2011 model years." This requirement is especially important because our Verify system is neither receiving detailed values nor making or verifying any of the calculations. Thus, EPA intends to carefully review these reports to ensure consistency and equity across manufacturers, and we will be able to ensure a level playing field only if the reports clearly show how the early credits were determined. If you have any questions, you may direct them to your EPA certification representative, or to Rob French at 734-214-4380, or french.roberts@epa.gov. Please submit your reports through Verify and send a copy to Rob French.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 3/28/2012 8:29:49 PM  
**Subject:** VW confirmatory results  
[2013 VW beetle confirmatory test results.pdf](#)

Mike, here's the data. Its also in Verify. Don't get too used to this fast turnaround, its not typical.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

CEI2T

## NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0133-001

Vehicle ID: VW465 790007/09

## Test Information



Test Date: 3/28/2012  
 Key Start / Hot Soak: 07:11:34 / 09:36  
 Fuel Container ID: F00023  
 Fuel Type: 61 Tier 2 Cert Test Fuel  
 Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa  
 Calculation Method: Gasoline  
 Pretest Remarks:

MFR Name: AUDI  
 MFR Codes: 640 ADX  
 Config #: 03  
 Transmission: S  
 Shift Schedule: A09980005  
 Beginning Odometer: 005391.0 MI  
 Drive Schedule: flp3bag  
 Soak Period: 20.9 hours

## Bag Data

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Phase 1						
Sample	11.975	80.830	1.070	1.197	3.230	
Ambient	2.418	0.402	0.035	0.049	2.031	
Net Concentration	9.775	80.464	1.039	1.153	1.382	8.258

Remarks:

## Phase 2

Sample	2.286	2.738	0.101	0.776	1.944	
Ambient	2.402	0.371	0.039	0.048	2.028	
Net Concentration	0.024	2.389	0.064	0.731	0.033	-0.012

Remarks:

## Phase 3

Sample	2.288	16.826	0.053	1.065	1.974	
Ambient	2.407	0.364	0.042	0.047	2.040	
Net Concentration	0.073	16.491	0.015	1.022	0.096	-0.033

Remarks:

## Phase 4

Sample  
 Ambient  
 Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.091	1.510	0.029	339.9	0.015	0.077 / 0.080	26.054
Phase 2	0.000	0.072	0.003	344.7	0.001	0.000 / 0.000	25.888
Phase 3	0.001	0.309	0.000	301.1	0.001	0.000 / 0.000	29.593
Weighted	0.01923	0.43560	0.00766	331.695	0.00366	(NMOG=1.04xNMHC) 0.0159 / 0.0166	

## Fuel Economy

Gasoline MPG

Phase 1	25.99
Phase 2	25.83
Phase 3	29.52

Weighted 26.76

## Dyno Settings

Dyno #: D002  
 Inertia: 3625  
 EPA Set Co A: 8.29  
 EPA Set Co B: 0.20559999  
 EPA Set Co C: 0.021129999  
 Emiss-Bench: D002

v101208 - d002 EPAVDAEm120328064325

Page 1 of 2

Print Time 28-Mar-2012 11:41



# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0133-001

Vehicle ID: VW465 790007/09

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.327	5.436	0.105	1223.6	0.053	0.276	1.098
Phase 2	0.001	0.276	0.011	1329.3	0.002	0.000	
Phase 3	0.002	1.113	0.002	1083.5	0.004	0.000	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.76	28.76	28.76	
Avg Cell Temp (degF)	75.02	75.14	75.68	
Dew Point (degF)	49.22	49.78	48.16	
Specific Humidity (grains/lbm)	54.13	55.27	51.98	
NOx Corr Factor	0.9107	0.9151	0.9024	
CO2 Dilution Factor	11.110	17.253	12.554	
CFV Vmix (scf @68F)	2049.02	3508.42	2046.47	
CVS Flow Rate Avg (scfm)	242.39	241.88	242.00	
Fan Placement: One Fan - Down - Front				
Phase Time (secs)	507.20	870.30	507.40	
Distance (miles)	3.600	3.857	3.598	
Bag Analysis Time (secs)	77.0	74.0	73.6	

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0224	0.45	0.005	325	0	0.018
Odometer	MPG	PM				
5237 M	27.4	0.002				
MPG is 2.39 % higher than EPA MPG						
MFR Lab: Volkswagen AG, Dept EASZ/1						
Dyno:						
Fuel: 61 Tier 2 Cert Gasoline						

CERT

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0133-003

Vehicle ID: VW465 790007/09

## Test Information



Test Date: 3/28/2012  
Key Start: 08:27:02  
Fuel Container ID: F00023  
Fuel Type: 61 Tier 2 Cert Test Fuel  
Test Procedure: 03 HWFET (hwhetprep\_hwhet)  
Calculation Method: Gasoline  
Pretest Remarks:

MFR Name: AUDI  
MFR Codes: 640 ADX  
Config #: 03  
Transmission: S  
Shift Schedule: A09980011  
Beginning Odometer: 005404.0 MI  
Drive Schedule: hwhet\_hwhet

## Bag Data

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Phase 1						
Sample	2.955	7.593	0.113	1.489	2.079	
Ambient	2.451	0.309	0.060	0.048	1.999	
Net Concentration	0.776	7.318	0.059	1.447	0.303	0.444

Remarks:

## Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

## Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

## Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.004	0.072	0.001	222.3	0.002	0.002 / 0.002	40.132

(NMOG=1.04xNMHC)

## Fuel Economy

Gasoline MPG  
Phase 1 40.04

## Dyno Settings

Dyno #: D002  
Inertia: 3625  
EPA Set Co A: 8.29  
EPA Set Co B: 0.20559999  
EPA Set Co C: 0.021129999  
Emiss-Bench: D002

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0133-003

Vehicle ID: VW465 790007/09

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.038	0.733	0.009	2275.9	0.017	0.022	1.098



## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.76			
Avg Cell Temp (degF)	75.54			
Dew Point (degF)	49.28			
Specific Humidity (grains/lbm)	54.24			
NOx Corr Factor	0.9111			
CO2 Dilution Factor	8.991			
CFV Vmix (scf @68F)	3036.20			

CVS Flow Rate Avg (scfm) 238.13

Fan Placement: One Fan - Down - Front

Phase Time (secs)	764.99
Distance (miles)	10.239
Bag Analysis Time (secs)	74.9

## MFR Test Results

for Procedure 3 HWFE

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0017	0.15	0.001	210	0	0.0004


Odometer	MPG	PM
5248 M	42.4	0.002

MPG is 5.90 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno:  
Fuel: 61 Tier 2 Cert Gasoline

CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0133-002				Vehicle ID: VW465 790007/09			
<div style="display: flex; justify-content: space-between;"> <div style="width: 15%;">  </div> <div style="width: 65%;"> <b>Test Information</b>            Test Date: 3/28/2012            Key Start: 09:11:05            Fuel Container ID: F00023            Fuel Type: 61 Tier 2 Cert Test Fuel            Test Procedure: 89 us062bag (us06warmup_2bagus06)            Calculation Method: Gasoline            Pretest Remarks:         </div> <div style="width: 20%;">           MFR Name: AUDI            MFR Codes: 640      ADX            Config #: 03            Transmission: S            Shift Schedule: A09980041            Beginning Odometer: 005425.0 MI            Drive Schedule: us06warmup_2bagus06         </div> </div>							
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
<b>Phase 1</b>							
Sample	3.445	175.199	1.850	0.828	2.389		
Ambient	2.377	0.565	0.016	0.045	1.968		
Net Concentration	1.218	174.670	1.835	0.786	0.546	0.619	
Remarks:							
<b>Phase 2</b>							
Sample	5.809	207.290	0.182	1.129	2.948		
Ambient	2.418	0.548	0.027	0.045	1.965		
Net Concentration	3.599	206.789	0.158	1.087	1.152	2.335	
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.024	6.876	0.108	486.2	0.012	0.012 / 0.013	17.956
Phase 2	0.031	3.560	0.004	294.1	0.011	0.020 / 0.021	29.767
(NMOG=1.04xNMHC)							
Composite	0.02914	4.29697	0.02723	336.831	0.01157	0.0182 / 0.0189	
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	17.91	Dyno #: D002					
Phase 2	29.70	Inertia: 3625					
		EPA Set Co A: 8.29					
		EPA Set Co B: 0.20559999					
		EPA Set Co C: 0.021129999					
Composite	25.90	Emiss-Bench: D002					

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0133-002

Vehicle ID: VW465 790007/09

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.042	12.245	0.193	865.8	0.022	0.021	1.098
Phase 2	0.191	22.181	0.025	1832.8	0.071	0.124	



## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.76	28.76		
Avg Cell Temp (degF)	75.47	75.13		
Dew Point (degF)	49.66	49.22		
Specific Humidity (grains/lbm)	55.02	54.13		
NOx Corr Factor	0.9142	0.9107		
CO2 Dilution Factor	15.838	11.654		
CFV Vmix (scf @68F)	2126.35	3253.34		

CVS Flow Rate Avg (scfm) 538.32 534.80

Fan Placement: US06 Only - One Large Fan - Down - Front

Phase Time (secs)	130.00	365.00	107.01
Distance (miles)	1.781	6.231	
Bag Analysis Time (secs)	80.2	267.8	

## MFR Test Results

for Procedure 90 US06

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0266	2.46	0.019	325	0	0.0177

Odometer 5268 M  
MPG 27.1  
PM 0.006  
MPG is 4.64 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno:  
Fuel: 61 Tier 2 Cert Gasoline

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 3/28/2012 9:15:49 PM  
**Subject:** Re: VW Group - Confirmatory tests for Audi A8 VID D3UF-DAQ  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Okay, I forwarded it to Ben.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>  
Date: 03/27/2012 11:41 AM  
Subject: VW Group - Confirmatory tests for Audi A8 VID D3UF-DAQ

Hello Jim,

I have submitted the Confirmatory test Supplemental Information for the VID D3UF-DAQ (A8 3.0L TFSI V6), Configuration 0 and Configuration 1

I have also changed the vehicle availability date in the Decision Information to April 30, 2012.

Please proceed with scheduling these tests and let me know as soon as possible if April 30th is acceptable.

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** "Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA;"Rodgers, William" [William.Rodgers@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/29/2012 6:39:29 PM  
**Subject:** RE: Lamborghini Laboratory Test Data  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Ok Mike, we'll take care of it. I'll ask about the canister re-filling hose.

I did check with the lab regarding the 0 Nox. Both the Quality guy and the lab engineer re-reviewed it and it all looks legitimate.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 03/29/2012 02:30 PM  
Subject: RE: Lamborghini Laboratory Test Data

Hi Jim and Vincent,

Lamborghini is \*not\* requesting a re-test. Therefore, we would like to know when the vehicle can be released. We will be making the transportation arrangements soon. Please advise.

Lastly, thanks again for your help and the tour yesterday, it was appreciated by all.

Regards  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207



From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, March 29, 2012 10:03 AM  
To: Giles, Michael  
Subject: Fw: Lamborghini Laboratory Test Data

Mike , here's the Lambo data. Passes but FE is off. We can talk after you've looked it over.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 03/29/2012 10:01 AM -----

From: Vincent Mazaitis/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/29/2012 06:58 AM  
Subject: Lamborghini Laboratory Test Data

Jim,

Official results are in Verify.

Vince Mazaitis

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 4/3/2012 9:23:30 PM  
**Subject:** Re: VW Group - Decision Information Submissions For Audi 2.0L TFSI Test Group DADXV02.03UB  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks, this is especially helpful given the Verify problem. Regarding the A8 testing, I am planning to test for PM since its an all new engine.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael" <michael.giles@vw.com>  
**Date:** 04/03/2012 12:43 PM  
**Subject:** VW Group - Decision Information Submissions For Audi 2.0L TFSI Test Group DADXV02.03UB

Hello Jim,  
I submitted to VERIFY the Tests and Decision Information for the following Vehicle IDs in the gasoline fueled test group DADXV02.03UB.  
I included the comments from our Input xml files. Note, the VERIFY system is stripping out the comments when it generates our Report xml files.  
These tests are for the same 2.0L TFSI models as 2012, but with new software and tests to optimize fuel economy. Please let me know if you have questions.

di-DFUB-BAQ,\_Configuration-0

This represents the 2013 Audi A4 Sedan quattro / A5 Coupe quattro as FEDV models. No new technology exists. Manuf. Confirmatory tests for FTP/HWY are required for high MPG for the ETA

di-DFUB-BAQ,\_Configuration-1

This represents the 2013 Audi A5 Cabrio quattro as the worst case EDV for this test group. No new technology exists. Manuf. Confirmatory tests for FTP/HWY are required for high MPG for the ETA

di-DFUB-BAA,\_Configuration-0

Represents 2013 Audi A4 allroad quattro as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

di-D3UB-BMQ,\_Configuration-0

Represents 2013 Audi A4 quattro with manual transmission as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

di-D3UB-BMQ,\_Configuration-1

Represents 2013 Audi A5 Coupe quattro with manual transmission as a FEDV. No new technology

included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

di-D3UB-BAF,\_Configuration-0

Represents 2013 Audi A4 FWD with CVT trans as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

di-D3UB-BAF,\_Configuration-1

Represents 2013 Audi A5 Cabrio FWD with CVT trans as a FEDV. No new technology included. Manuf. Confirmatory tests FTP/HWY are required because of high MPG for the ETW

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Thomas, Richard" [Richard.Thomas@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 4/11/2012 2:06:05 PM  
**Subject:** 3.0L A8 timing

I talked to Ben Haynes in the lab and he is willing to consider moving up the 3.0L A8 if you give us some idea of when it could be available.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 4/11/2012 9:09:56 PM  
**Subject:** RE: VW Group - Certificate Requests for Audi 2.0L TFSI  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

I'll try for thurs if I get time , if not, then monday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>  
Date: 04/11/2012 12:59 PM  
Subject: RE: VW Group - Certificate Requests for Audi 2.0L TFSI

Yes the Audi application is a higher priority now.  
Thanks,  
Bill

From: Jim Snyder [mailto:[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)]  
Sent: Wednesday, April 11, 2012 12:21 PM  
To: Rodgers, William  
Subject: RE: VW Group - Certificate Requests for Audi 2.0L TFSI

I was working on the Bugatti cert. Would you prefer I focus on the Audis instead?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 04/11/2012 11:36 AM  
Subject: RE: VW Group - Certificate Requests for Audi 2.0L TFSI

Hi Jim,

Is there any possibility to get the certificates requested on April 5th for test group DAD XV02.03UB by early next week?

We've got a small dealer demo fleet that the Sales Dept. wants to release to dealers earlier than expected.

Thanks,

Bill

From: Rodgers, William

Sent: Thursday, April 05, 2012 4:26 PM

To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)

Subject: VW Group - Certificate Requests for Audi 2.0L TFSI

Hi Jim,

I submitted the Initial Application and following Certificate Requests for the Audi 2.0L TFSI (non-FFV) Test Group DAD XV02.03UB. I erroneously indicated a conditional certificate for the evaporative family 140C7A, when in fact it uses carryover test data from 2012.

cert\_request\_DAD XV02.03UB\_DAD XR0140B8A – conditional pending manufacturer confirmatory tests for high fuel economy.

cert\_request\_DAD XV02.03UB\_DAD XR0140C7A

Regards,

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.

Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

william.rodgers@vw.com

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** CN=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 1/8/2009 7:22:07 PM  
**Subject:** RE: Fw: Hybrid Vehicle Meeting in Early 2009

Len, I think we can deal with that if that's their schedule. I would say more than 3/4 of us will be there on a Friday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

"Kata, Leonard" <Leonard.Kata@vw.com>  
01/08/2009 02:11 PM  
To: Jim Snyder/AA/USEPA/US@EPA  
cc: Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA  
Subject: RE: Fw: Hybrid Vehicle Meeting in Early 2009

Hello Jim:

I have heard back from my colleagues regarding the timing of a meeting to discuss topics related to the certification and testing of hybrid vehicles. The proposal is the end of the week of March 2, 2009. More specifically, the afternoon of March 5 and the morning of March 6. I am not sure how you would feel about dividing the meeting over two days, particularly since the second day is a Friday. I realize that some of the staff may not be in on Friday.

Please let me know if this timeframe is workable.

Best regards,

Len Kata

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com  
From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Thursday, December 11, 2008 4:30 PM  
To: Kata, Leonard  
Subject: Re: Fw: Hybrid Vehicle Meeting in Early 2009

Len, We are certainly interested in having a meeting with them. It will be with me, Linc, Steve Healy, Chris Nevers, Dave Good and possibly Arvon Micham. I don't think we have any particular timing constraints yet.

Are they planning to visit the U.S. a particular week? Let me know and I will fit a meeting time into our schedules.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

Linc Wehrly/AA/USEPA/US  
12/09/2008 08:07 AM

To Jim Snyder/AA/USEPA/US@EPA  
cc Stephen Healy/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA  
Subject Fw: Hybrid Vehicle Meeting in Early 2009

Jim,

Please be sure to invite Steve and Chris to this meeting.

Thanks,  
Linc

Linc Wehrly  
Manager, Light-Duty Vehicle Group



Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4286  
wehrly.linc@epa.gov

----- Forwarded by Linc Wehrly/AA/USEPA/US on 12/09/2008 08:06 AM -----

"Kata, Leonard" <Leonard.Kata@vw.com>

Sent by: "Kata, Leonard" <Leonard.Kata@vw.com>

Received Date:

12/08/2008 04:55 PM

Transmission Date:

12/08/2008 04:55:42 PM

To Linc Wehrly/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Jim Snyder/AA/USEPA/US@EPA,

Ex. 7 @arb.ca.gov>, Ex. 7 @arb.ca.gov>

cc

Subject Hybrid Vehicle Meeting in Early 2009

To all:

My colleagues in at our parent company in Germany have expressed an interest in meeting with the certification staff at EPA and ARB to discuss issues related to hybrid vehicle technology and certification. The following is a general list of the topics of interest:

- HEV Concepts/Technology
- Certification, Durability, Emissions Measurement
- Test Procedures
- Pressurized Fuel Tank
- Bench Testing
- Other

We would like to use the opportunity to share our thoughts on these topics and discuss the intent and direction of the agencies. At this time I would like to suggest meeting with each agency separately, in the mid-February to early-March time frame. My questions are 1.) whether the agencies are agreeable to such a meeting, 2.) who you would recommend participate from the agencies, and 3.) if there any particular time constraints during the suggested period.

I appreciate your consideration of this suggestion and look forward to hearing from you.

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207

E-Mail: leonard.kata@vw.com

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 1/22/2009 6:27:08 PM  
**Subject:** Bugatti

Len, I wanted to let you know I put the Bugatti Request for Certificate on hold. I didn't see anything in the Bugatti application regarding durability so I assumed its relying on VW? I checked with Arvon and VW Audi has not yet submitted Requests for 2010 Durability Approval.

Let me know if I missed something otherwise we need a durability approval request.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 1/29/2009 8:12:16 PM  
**Subject:** RE: Fw: Hybrid Vehicle Meeting in Early 2009

Got your voice mail. I already scheduled the room so we're safe on that point. You should have an invitation. I picked the big one next to the lobby so we have lots of room. Let me know when you have more specifics and I'll pass it on so we can coordinate who's there/when.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Reineke, Dennis" [Dennis.Reineke@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 2/4/2009 9:22:54 PM  
**Subject:** Re: Audi Durability Grouping Request

You are requesting to include the 2010 Audi S6 and S8 in the same durability group as the previous 2007-09 even though it has a revised catalyst loading. Section 86.1820-01 (e) allows Administrative approval to include vehicles in a common durability group given evidence that emissions deterioration and component durability will be equivalent or better. Based on the changes outlined below (66% higher catalyst loading) while all else is the same (carryover), I think there is sufficient evidence that this package will have an equivalent degree of deterioration. After reviewing the request and discussing amongst the Certification group members, we agree that this application (with higher loading) can be included in durability group AADXGPNN385 and Test group AADXV05.2385.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

"Reineke, Dennis" <Dennis.Reineke@vw.com>  
01/30/2009 10:49 AM  
To: Jim Snyder/AA/USEPA/US@EPA  
cc  
Subject: Audi Durability Grouping Request

Hello Jim,

In response to the questions raised in our recent phone call about durability and test group grouping the paragraph below provides Audi AG's intent.

Audi intends to use a catalyst with a 66% higher loading rate as part of their strategy to meet CARB 2010 MY catalyst efficiency monitoring requirements. This change will occur as part of the carryover of the 50-State certified Audi S6 and S8 models. All vehicles in the durability group/test group will be built with the new catalyst. Engine calibration, catalyst size, catalyst location and catalyst precious metal composition are all unchanged. The only difference compared to previous model years is the increased precious metal loading rate. Initial development testing shows a reduction of approximately 15% in emissions and no effect on fuel economy. Based on supplier testing and Audi AG's experience with similar catalyst the deterioration rate for this new catalyst is expect to be equal to or better than the existing catalyst. Audi intends include this catalyst in carryover durability group AADXGPNN385 / Test Group AADXV05.2385. Durability factors from the 2007-09 MY carryover durability vehicle would be used to support 2010 MY certification. A new durability vehicle would not be required.

We believe this approach is allowed under 86.1820-01(e)

Please review and contact me with any questions.

Best Regards,

Dennis E. Reineke  
Certification Specialist  
Engineering and Environmental Office

Volkswagen Group of America  
3800 Hamlin Road  
Mail Code EEO  
Auburn Hills, MI 48326  
USA  
Phone: +1-248-754-4215  
Fax : +1-248-754-4207  
Mail To: Dennis.Reineke@vw.com

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 2/17/2009 4:30:40 PM  
**Subject:** Re: FW: MY2010 Durability Approvals

Yes, that address , 'synder.jim@epa.gov' , is incorrect. I found out its in the online directory and I'm trying to get it updated.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
synder.jim@epa.gov

"Kata, Leonard" <Leonard.Kata@vw.com>  
02/16/2009 06:07 PM  
To Jim Snyder/AA/USEPA/US@EPA  
cc  
Subject FW: MY2010 Durability Approvals

Hi Jim:

Second attempt. I received an "undeliverable" response to the 'synder.jim@epa.gov' address.

Regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

-----Original Message-----

From: Kata, Leonard  
Sent: Monday, February 16, 2009 6:04 PM  
To: 'Mitcham.Arvon@epamail.epa.gov'  
Cc: "  
Subject: RE: MY2010 Durability Approvals

Hello Arvon:

I left a telephone message, but I thought that I would follow-up with an e-mail.

I am interested in the status of the VW request for carryover of the durability program to 2010. Any news?

Best regards,

Len

---

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

-----Original Message-----

From: Kata, Leonard  
Sent: Friday, January 30, 2009 7:06 PM  
To: 'Mazaitis.Vincent@epamail.epa.gov'  
Cc: 'Mitcham.Arvon@epamail.epa.gov'; Reineke, Dennis; Hart, Robert (VWoA)  
Subject: RE: MY2010 Durability Approvals

Hello Mr. Mazaitis:

For the 2010 model year, Volkswagen is requesting carryover of the previously-approved durability procedure. You will find that I have submitted the official request through the VERIFY system for review. It was submitted as Volkswagen input; however, as described in the letter, it applies to all Volkswagen Group brands sold in North America (Volkswagen, Audi, Bentley, Lamborghini and Bugatti).

Please let me know if there are any questions,



Best regards,

Leonard W. Kata  
Manager  
Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
FAX: (248) 754-4207  
E-Mail: leonard.kata@vw.com

-----Original Message-----

From: Reineke, Dennis  
Sent: Thursday, January 29, 2009 2:07 PM  
To: 'Mazaitis.Vincent@epamail.epa.gov'  
Cc: Kata, Leonard  
Subject: RE: MY2010 Durability Approvals

Hello Vince,

I am forwarding this to Len Kata who is currently working on this topic.

Best Regards,

Dennis

Dennis E. Reineke  
Certification Specialist  
Engineering and Environmental Office

Volkswagen Group of America

3800 Hamlin Road  
Mail Code EEO  
Auburn Hills, MI 48326  
USA  
Phone: +1-248-754-4215  
Fax : +1-248-754-4207  
Mail To: Dennis.Reineke@vw.com

-----Original Message-----

From: Mazaitis.Vincent@epamail.epa.gov  
[mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Thursday, January 29, 2009 8:33 AM  
To: Reineke, Dennis  
Subject: Fw: MY2010 Durability Approvals

Hello Dennis,

I hope all is well.

Not sure if you're the right contact or not for durability issues.  
Please let me know if you are not the right person.

For your information.

Thanks Dennis,

Kind regards,,

Vince Mazaitis

----- Forwarded by Vincent Mazaitis/AA/USEPA/US on 01/29/2009 08:28 AM  
-----

Arvon  
Mitcham/AA/USEPA  
/US  
EPA-OAR,OTAQ,CIS      To  
D      OAR-OTAQ-CISD-LDVG  
cc  
Sent by: Arvon  
Mitcham      Subject  
MY2010 Durability Approvals  
Received Date:  
01/22/2009 11:24  
AM  
Transmission  
Date:  
01/22/2009  
11:24:16 AM

I am waiting for durability approval requests from the following  
manufacturers:

VW-Audi

If you are the compliance rep. for one of these manufacturers, please  
remind them that they need to request approval of durability for MY2010  
prior to certification. If not, they are in non-compliance with 40 CFR  
86.1823-08 (Durability Regulations).

All other manufacturers not listed here have either been approved or are

small volume and using assigned DFs.

If you have questions or concerns, let me know. Thank you.

-ALM

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Bruce Sdunek/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 2/26/2009 7:48:56 PM  
**Subject:** Re: VW Group: Audi Field Fixes for MY 2000 thru 2002  
[CBI\\_YAD XV01.8332\\_APP\\_F01\\_R00.PDF](#)  
[CBI\\_1AD XV01.8342\\_APP\\_F02\\_R00.PDF](#)  
[CBI\\_2AD XV01.8342\\_APP\\_F18\\_R00.PDF](#)  
<mailto:robert.hart@vw.com>

Thanks, I'll look them over.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

"Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
02/26/2009 02:33 PM  
To: Jim Snyder/AA/USEPA/US@EPA, Bruce Sdunek/AA/USEPA/US@EPA  
cc  
Subject: VW Group: Audi Field Fixes for MY 2000 thru 2002

Hello Jim and Bruce,

I'm not sure which one to send this to, so I'm sending it to both of you.

The attachments contain field fixes for model year 2000 through 2002 Audi test groups YAD XV01.8332, 1AD XV01.8342 and 2AD XV01.8342. The Verify system only goes back to model year 2003. This is the reason for this e-mail.

There are nine additional Audi field fixes uploaded to the Verify system.

If you have any questions regarding the attached information, please contact me as indicated below.

Best regards,  
Bob Hart  
Robert Hart  
Emissions & Regulatory Analyst  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207  
mailto:robert.hart@vw.com

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 3/4/2009 10:50:59 PM  
**Subject:** Re: Volkswagen/Audi

[Ex. 7] are planning to bring copies of the presentation or can you send it to us ahead of time? It would be nice to have handouts to look at and take notes on during the presentation.

I also invited Karl Paulina from the lab. He'll be interested in the parts about HEV testing .

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

[Ex. 7]@vw.com>  
03/04/2009 02:39 PM  
To Jim Snyder/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Arvon Mitcham/AA/USEPA/US@EPA, Ted Trimble/AA/USEPA/US@EPA  
cc [Ex. 7]@vw.com>, [Ex. 7]@vw.com>, [Ex. 7]  
[Ex. 7]@AUDI.DE>, [Ex. 7]@volkswagen.de>, [Ex. 7]  
[Ex. 7]@AUDI.DE>, [Ex. 7]@vw.com>  
Subject Volkswagen/Audi

To all:

A few days ago I distributed a draft agenda for our meetings scheduled for Thursday (5.MAR) and Friday (6.MAR) of this week. We have finalized the agenda and I am now providing the final version. The agenda includes a discussion of durability procedures and OBD, so I have added Arvon Mitcham and Ted Trimble to the distribution. They were not on the EPA meeting invitation, but I hope that they are able to participate.

We will be forwarding some material shortly, that presents a preview of the upcoming Volkswagen and Audi hybrid technology, for your reference.

We will try our best to cover the bulk of this material on Thursday afternoon.

Best regards,

[Ex. 7]  
-----

## **Ex. 7**

Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

## **Ex. 7**

E-Mail: **Ex. 7**@vw.com

[attachment "Agenda EPA Cert\_Final.ppt" deleted by Jim Snyder/AA/USEPA/US]

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=David  
Good/OU=AA/O=USEPA/C=US@EPA; [Ex. 7] @vw.com;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=David  
Good/OU=AA/O=USEPA/C=US@EPA;CN=Carl  
Paulina/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Arvon  
Mitcham/OU=AA/O=USEPA/C=US@EPA[]; N=David  
Good/OU=AA/O=USEPA/C=US@EPA; [Ex. 7] @vw.com;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=David  
Good/OU=AA/O=USEPA/C=US@EPA;CN=Carl  
Paulina/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Arvon  
Mitcham/OU=AA/O=USEPA/C=US@EPA[]; [Ex. 7] @vw.com;CN=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=David  
Good/OU=AA/O=USEPA/C=US@EPA;CN=Carl  
Paulina/OU=AA/O=USEPA/C=US@EPA;CN=Martin  
Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Arvon  
Mitcham/OU=AA/O=USEPA/C=US@EPA[]; N=Linc  
Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen  
Healy/OU=AA/O=USEPA/C=US@EPA;CN=Robert  
Peavyhouse/OU=AA/O=USEPA/C=US@EPA;CN=David  
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Good/OU=AA/O=USEPA/C=US@EPA;CN=Carl  
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Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Arvon  
Mitcham/OU=AA/O=USEPA/C=US@EPA[]; N=Arvon Mitcham/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 3/6/2009 1:58:11 PM  
**Subject:** Reminder: VW mtg starts at 9:30 today not 9:00,,Room C126



Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** robert.hart@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/19/2009 8:28:23 PM  
**Subject:** MY 2010 Lamborghini Test Group ANLXV06.5474

Bob, I looked this certificate request. So far it looks okay except for the fees. According to the filing form, it was just submitted 3/18/09, yesterday. If that's correct, it will take a while for it to show up in our "Fees Paid" records. I checked and didn't see it there yet.

Just wanted to warn you it may be a few days, or more, for this Certificate because of that.

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**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 5/4/2009 5:48:10 PM  
**Subject:** Re: Status of Certificate for Bentley Test Group ABEXV06.0501  
<mailto:robert.hart@vw.com>

I've been waiting for the fee payment to appear on the list. It is listed on today's update so I can now finish reviewing it.

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"Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
05/04/2009 01:29 PM  
To: Jim Snyder/AA/USEPA/US@EPA  
cc  
Subject: Status of Certificate for Bentley Test Group ABEXV06.0501

Hello Jim,

Can you tell me the status of the Certificate for Bentley Test Group ABEXV06.0501?

Best regards,

Bob Hart

Robert Hart  
Emissions & Regulatory Analyst  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: 248 754 4224  
Fax: 248 754 4207  
<mailto:robert.hart@vw.com>

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 5/15/2009 1:25:07 PM  
**Subject:** audi A3UC/0 confirmatory on hold

Bob, Yes I received your message and put it on hold as of Wednesday. I was planning to send you a note today, sorry its was really hectic this week until today.

Let me know when you are ready to re-schedule it.

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**To:** Robert.Hart@vw.com[]  
**Cc:** CN=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/15/2009 6:26:45 PM  
**Subject:** Rescheduled VW

The Test Lab has re-scheduled Veh# VW35100052/10 from 7/8/09 to 8/5/09 to combine travel. Same week as the Toureg veh#756 0-0012/10 is scheduled.

The VW CC Veh. 46800062/10 will be scheduled for 8/24/09 or later.

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**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 8/31/2009 3:09:46 PM  
**Subject:** RE: testing status

It looks like I was too optimistic. They are still working on it this morning. But they might get cell 5 running. Bottom line, still don't know when it will get scheduled.

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**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Date:** 08/28/2009 04:07 PM  
**Subject:** RE: testing status

Hello Jim,

Thanks for the update. Please let me know as soon as they reschedule the CC.

Have a great weekend!

Bob Hart

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Friday, August 28, 2009 9:41 AM  
**To:** Hart, Robert (VWoA)  
**Cc:** Mazaitis.Vincent@epamail.epa.gov  
**Subject:** testing status

I walked over to the lab, Looks like they fixed the problems in the cell and are checking it out right now. But nothing is prepped for today. I think we'll be up and running stuff monday. Don't know when the CC will run yet.

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**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/8/2009 3:05:54 PM  
**Subject:** Cold NMHC

Just an update, Wednesday was very hectic and I didn't get a chance to look at your attachments. I hope to review them this afternoon.

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**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 10/16/2009 7:46:12 PM  
**Subject:** Re: VW Group: Cold NMHC Updates  
<mailto:robert.hart@vw.com>

Looks okay. Thanks.

Jim Snyder  
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From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 10/15/2009 04:13 PM  
Subject: VW Group: Cold NMHC Updates

Hello Jim,

I just realized that I did not inform you when I uploaded the MY 2009 application updates to add the Cold NMHC compliance text.

I finished them on Monday. The test results are in Section 7 on the Federal page for Cold CO as you requested.

Here is a list of the files that were uploaded.

CBI\_9VWXB\_COMMON\_APP\_UPD\_R01.PDF  
CBI\_9AD XV02.03PA\_APP\_UPD\_R01.PDF  
CBI\_9AD XV02.03UA\_APP\_UPD\_R01.PDF  
CBI\_9AD XV02.03UB\_APP\_UPD\_R01.PDF

The FOI copies of the same files were also uploaded.

Let me know if you have any questions.

Best regards,

Bob Hart

Robert Hart  
Emissions & Regulatory Analyst  
Engineering and Environmental Office

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3800 Hamlin Road

Auburn Hills, MI 48326

Phone: 248 754 4224

Fax: 248 754 4207

<mailto:robert.hart@vw.com>

**To:** "Reineke, Dennis" [Dennis.Reineke@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/29/2009 9:48:52 PM  
**Subject:** cert request

Hi Dennis, just wanted to let you know that I saw your conditional certificate request. I quickly glanced through it and it looks okay but I ran out of time to really go over it. I won;t be in friday, I will finish reviewing it on monday.

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**To:** robert.hart@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/10/2009 8:38:32 PM  
**Subject:** Fw: VW certification information request

Bob, a chemical engineer in the Advanced Technology Division is reviewing the 2010 TDI diesel in the Jetta, test group AVWXV02.0U5N. He asked me for the details on the aftertreatment and I couldn't find some of it in the certificate application documentation as required. Specifically information on the type of catalysts, catalyst loadings/volumes, DPF volume, and LNT loadings. Please supply the requested info, thanks.

Here is his note:

Jim hi, ... I was wondering if you could look up the 2010 Jetta and give me the particulars on the aftertreatment, type of converters/DPFs/LNT, catalyst loadings, volumes, etc, ... Lynn Sohacki told me you were the VW contact, thanks, Greg

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**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 12/16/2009 10:16:39 PM  
**Subject:** Re: VW Group: Request for an Extension for Submission of the MY 2009 Volkswagen Group Common Sections.

That is acceptable timing.

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**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 12/15/2009 01:03 PM  
**Subject:** VW Group: Request for an Extension for Submission of the MY 2009 Volkswagen Group Common Sections.

Hello Jim,

The attached letter was also submitted through the VERIFY System.  
We are requesting a time extension for submission of the final update of the MY 2009 Volkswagen Group Common Sections. (See attachment.)

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

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E-mail: robert.hart@vw.com  
[attachment "CBI\_9VWX\_COMMON\_RFA\_APP\_R00.PDF" deleted by Jim Snyder/AA/USEPA/US]

**To:** "Reineke, Dennis" [Dennis.Reineke@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 12/22/2009 8:54:42 PM  
**Subject:** VW confirmatory EPA shed test results

Haven't seen anything official yet but I heard it passed at .1929g

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**To:** "Thomas, Richard" [Richard.Thomas@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/4/2010 8:23:05 PM  
**Subject:** Fw: 2010 Verify VW Labels  
[2010\\_Verify\\_VW\\_Labels.xls](#)

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----- Forwarded by Jim Snyder/AA/USEPA/US on 01/04/2010 03:22 PM -----

From: Robert Peavyhouse/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 01/04/2010 02:47 PM  
Subject: 2010 Verify VW Labels

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Thomas, Richard" [Richard.Thomas@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/4/2010 8:33:31 PM  
**Subject:** Re: Fw: 2010 pollution scores  
[pollution score chart summarychart.pdf](#)

I found the attached chart that listed .

<http://www.epa.gov/greenvehicles/Aboutratings.do#aboutairpollution>

<http://www.epa.gov/greenvehicles/summarychart.pdf>

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Vehicle Emission Standards and Air Pollution Score							
US EPA Federal Tier 2 Emission Standard Bins and California and Northeast States LEV II Emission Standards							Air Pollution Score
Standard	Vehicles	Emission Limits at Full Useful Life (100,000-120,000 miles)					
		Maximum Allowed Grams per Mile					
		NOx	NMOG	CO	PM	HCHO	
Bin 1	LDV, LLDT, HLDT, MDPV	0.00	0.000	0.0	0.0	0.0	10
ZEV	LDV, LDET	0.00	0.000	0.0	0.0	0.0	
PZEV	LDV, LDT	0.02	0.010	1.0	0.01	0.004	9.5
SULEV II	LDV, LDT	0.02	0.010	1.0	0.01	0.004	9
Bin 2	LDV, LLDT, HLDT, MDPV	0.02	0.010	2.1	0.01	0.004	8
Bin 3	LDV, LLDT, HLDT, MDPV	0.03	0.055	2.1	0.01	0.011	
ULEV II	LDV, LDT	0.07	0.055	2.1	0.01	0.011	7
Bin 4	LDV, LLDT, HLDT, MDPV	0.04	0.070	2.1	0.01	0.011	6
Bin 5	LDV, LLDT, HLDT, MDPV	0.07	0.090	4.2	0.01	0.018	
LEV II	LDV, LDT	0.07	0.090	4.2	0.01	0.018	
Bin 6	LDV, LLDT, HLDT, MDPV	0.10	0.090	4.2	0.01	0.018	5
LEV II option 1	LDV, LDT	0.10	0.090	4.2	0.01	0.018	4
SULEV II	MDV4	0.10	0.100	3.2	0.06	0.008	
Bin 7	LDV, LLDT, HLDT, MDPV	0.15	0.090	4.2	0.02	0.018	3
SULEV II	MDV5	0.20	0.117	3.7	0.06		
Bin 8a	LDV, LLDT, HLDT, MDPV	0.20	0.125	4.2	0.02	0.018	2
ULEV II	MDV4	0.20	0.143	6.4	0.06	0.016	
Bin 8b	HLDT, MDPV	0.20	0.156	4.2	0.02	0.018	
LEV II	MDV4	0.20	0.195	6.4	0.12	0.032	1
Bin 9a	LDV, LLDT	0.30	0.090	4.2	0.06	0.018	
Bin 9b	LDT2	0.30	0.130	4.2	0.06	0.018	
Bin 9c	HLDT, MDPV	0.30	0.180	4.2	0.06	0.018	0
ULEV II	MDV5	0.40	0.167	7.3	0.06		
Bin 10a	LDV, LLDT	0.60	0.156	4.2	0.08	0.018	0
LEV II	MDV5	0.40	0.230	7.3	0.12		
Bin 11	MDPV	0.90	0.280	7.3	0.12	0.032	

See Glossary in Summary of Current and Historical Emission Standards for explanation of terms.

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Thomas, Richard" [Richard.Thomas@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 1/4/2010 8:38:20 PM  
**Subject:** Re: Fw: 2010 Verify VW Labels  
[2010\\_Verify\\_VW\\_Labels.xls](#)

Jim Snyder  
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snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: "Thomas, Richard" <Richard.Thomas@vw.com>  
Date: 01/04/2010 03:23 PM  
Subject: Fw: 2010 Verify VW Labels

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----- Forwarded by Jim Snyder/AA/USEPA/US on 01/04/2010 03:22 PM -----

From: Robert Peavyhouse/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 01/04/2010 02:47 PM  
Subject: 2010 Verify VW Labels

Robert Peavyhouse  
Compliance and Innovative Strategies Division  
U.S. EPA - Office of Transportation and Air Quality  
phone: (734) 214-4814  
fax: (734) 214-4869  
email: peavyhouse.robert@epa.gov  
website: <http://www.epa.gov/nvfel/>

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 1/6/2010 3:29:50 PM  
**Subject:** Re: Green Vehicle Guide Listing of PZEVs

Thanks for the specifics, I look into it.

Jim Snyder  
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snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** [Ex. 7]@vw.com> [Ex. 7]@vw.com>  
**Date:** 01/05/2010 01:34 PM  
**Subject:** Green Vehicle Guide Listing of PZEVs

Hello Jim;

Thanks for the table with the models and label index numbers. I have reviewed it and found that there are a couple of models missing from the Green Vehicle Guide web site, but do appear in the fueleconomy.gov site. They are:

New Beetle                      2.5L automatic transmission    label index 65  
New Beetle Convertible    2.5L automatic transmission    label index 66

These two labels were calculated with both BIN 5 and PZEV test group configuration data and therefore PZEV versions should also appear on the Green Vehicle Guide but don't. Perhaps you can investigate why the manual transmission version of the New Beetle appears, while the automatic transmission versions of the New Beetle and New Beetle Convertible do not appear.

The other two models (GTI 2.0L M6 and Jetta 2.0L M6) should now appear on the Green Vehicle Guide after I corrected Audi label index 055 and 056 to change the test group name to the appropriate PZEV test group name for a couple of configurations. Perhaps an update of the green vehicle guide is going to happen soon and these two models will additionally appear as PZEVs.

The only other models in which a PZEV version does not appear is due to the late production and certification of the 2.0L PZEV test group for the Passat, Passat Wagon and CC. The SOP was the first week in November, 2009. I will investigate the status of this new test group and the general label calculation.

Thanks,  
[Ex. 7]  
VOLKSWAGEN GROUP OF AMERICA, INC.  
3800 Hamlin Road

Auburn Hills, MI 48326

Engineering and Environmental Office (EEO)

**Ex. 7**

**Ex. 7** @VW.com

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 2/2/2010 8:20:54 PM  
**Subject:** RE: Meeting with Volkswagen and Audi Representatives

Okay, I'll set it up.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 02/02/2010 03:10 PM  
**Subject:** RE: Meeting with Volkswagen and Audi Representatives

Hi Jim:

I have the date wrong. The request is for Thursday, March 4, 2010.

Best regards,

[Ex. 7]

---

[Ex. 7]

Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

[Ex. 7]

E-Mail: [Ex. 7]@vw.com

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Tuesday, February 02, 2010 3:03 PM  
**To:** [Ex. 7]  
**Subject:** Re: Meeting with Volkswagen and Audi Representatives

**Ex. 7** do you mean Thursday the 4th or Friday the 5th?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: **Ex. 7** @vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 02/02/2010 01:45 PM  
Subject: Meeting with Volkswagen and Audi Representatives

Hello Jim:

I am writing to request another meeting (and providing a bit more notice this time!).

Our colleagues from Audi will be in the U.S. during the first week in March 2010 to participate in a number of meetings. They wish to meet with EPA Staff. Unfortunately, they will be in our area for only one day, Thursday March 5, 2010. Would it be possible to arrange a meeting at EPA Ann Arbor on that day?

The discussion topics include:

Presentation and request for approval of a new tank concept for for SCR systems in various Audi models equipped with the 3.0L TDI diesel engine.

Diesel Exhaust Fluid distribution infrastructure.

We have a window of time available between 9:00am and 2:00pm on March 5, 2010. We would like to request about 2.5 hours, sometime within the window. The group cannot meet beyond 2:00 pm due to flight arrangements.

A quick response would be appreciated so that travel arrangements can be locked in this week. Sorry about all of the conditions.

Best regards,

**Ex. 7**

---

**Ex. 7**

Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

**Ex. 7**

E-Mail: **Ex. 7** @vw.com



**To:** CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** [Ex. 7] [Ex. 7]@vw.com]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 2/16/2010 5:13:44 PM  
**Subject:** Re: Contact info

Yes, its basically the same VW people, at least for emissions purposes.

[Ex. 7] depending on the topic.

[Ex. 7]@vw.com,  
[Ex. 7]@vw.com  
[Ex. 7]@vw.com

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Martin Reineman/AA/USEPA/US  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 02/16/2010 12:01 PM  
**Subject:** Contact info

Do you have e-mail addresses for contacts at Audi and Bentley?



**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 2/22/2010 8:44:31 PM  
**Subject:** Re: VW/Audi Meeting

[Ex. 7] I scheduled a meeting so we have a room reserved. Can you give me some specifics? Is it more certification type questions, confirmatory data or testing issues?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 02/17/2010 06:24 PM  
**Subject:** VW/Audi Meeting

Hello Jim:

I guess that my colleagues from Germany have some additional questions regarding certification of EVs, FCEVs, PHEV etc. They will be in the Detroit area in mid-March. Is it possible to schedule a meeting for the morning of March 18, 2010? This would be in addition to the meeting that we have schedule for March 4, 2010.

Best regards,

[Ex. 7]

---

**Ex. 7**

Emission Regulations and Certification  
Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

**Ex. 7**

E-Mail: [Ex. 7]@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 3/10/2010 9:30:05 PM  
**Subject:** Re: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Yes, I see it. I'm backed up today but I'd like to call and ask a few questions about it tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 03/10/2010 11:37 AM  
**Subject:** VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Hello Jim.

This is just a "heads-up" for the running change test waiver request that I just submitted to Verify. Bugatti is bumping up the engine output to 1200 h.p..

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Lynn Sohacki/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 3/15/2010 3:16:57 PM  
**Subject:** Re: VW Group: Request for ORVR Approval  
CBI\_BADXR0155D4Q\_RFA\_ORVR\_R00.PDF

Yes, Lynn is still the person for reviewing ORVR systems.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 03/12/2010 02:32 PM  
**Subject:** VW Group: Request for ORVR Approval

Hello Jim,

I have just submitted an ORVR system approval request to Verify, addressed to you, for MY 2011 Evap/Refueling Family BADXR0155D4Q. I attached a copy for your convenience.  
I'm not sure who I needed to address it to. Does Lynn Sohacki still review ORVR systems?

Also, the last I heard, we no longer have to send a copy to NHTSA. They only want to see it if the EPA has concerns. Is that still the case?

This new Evap/Refueling Family uses a Natural Vacuum Leak Detection system (NVLD) that is new technology for the Volkswagen Group. Otherwise, the system is similar to our other evap families.

Please alert whomever is responsible for ORVR review to this submission.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA[]  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 3/15/2010 5:59:26 PM  
**Subject:** RE: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Bob, I waived the Bugatti request this morning. Did you receive an email notification of it from Verify?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/15/2010 07:50 AM  
Subject: RE: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Hello Jim,

According to Germany, the 1200 hp engine has a modification to the catalyst coating but the precious metal loading stays at the same level. Bugatti uses EPA assigned DF's so it would still be covered within the same durability group statistic.

Let me know if you have any other questions.

Best regards,

Bob Hart

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, March 10, 2010 4:30 PM  
To: Hart, Robert (VWoA)  
Subject: Re: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Yes, I see it. I'm backed up today but I'd like to call and ask a few questions about it tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/10/2010 11:37 AM  
Subject: VW Group: MY 2010 Bugatti Running Change Test Waiver Request Submitted to Verify

Hello Jim.

This is just a "heads-up" for the running change test waiver request that I just submitted to Verify. Bugatti is bumping up the engine output to 1200 h.p..

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/16/2010 7:42:43 PM  
**Subject:** Re: VW/AUDI Meeting March 18, 2010

Thanks, I forwarded it so we can look at it beforehand.

Do you have a projector or do I need to reserve one?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** [Ex. 7]@vw.com>, [Ex. 7]  
[Ex. 7]@AUDI.DE>, [Ex. 7]@volkswagen.de>, [Ex. 7]  
[Ex. 7]@vw.com>  
**Date:** 03/16/2010 10:22 AM  
**Subject:** VW/AUDI Meeting March 18, 2010

Hello Jim:

In preparation for our meeting on March 18, 2010, I am providing, as a refresher, the report from our last meeting on January 27, 2010, including the presentation material.

Also attached is the new presentation material.

Please treat all materials as CONFIDENTIAL.

See you on Thursday.

Best regards,

[Ex. 7]

---

[Ex. 7]

[Ex. 7]

Engineering and Environmental Office

Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7** @vw.com

[attachment "Microsoft PowerPoint - EPA\_agenda\_presentation\_Jan\_2010\_part1.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "Microsoft PowerPoint - EPA\_agenda\_presentation\_Jan\_2010\_part2.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "Meeting Report\_JAN\_27\_2010.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "00\_Agenda\_EPA\_Cert.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "01\_HEV\_EPA\_Cert\_f.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "02\_EPA\_operation\_mode.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "03\_EPA\_EV\_FCEV.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "04\_HEV\_EPA\_Cert\_f.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "05\_EPA\_test\_matrix\_types.pdf" deleted by Jim Snyder/AA/USEPA/US] [attachment "06\_EPA\_Coldstart\_valve.pdf" deleted by Jim Snyder/AA/USEPA/US]



**To:** Ex. 7 @vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 3/18/2010 8:38:22 PM  
**Subject:** possible Cert preview dates

Ex. 7 checked my calendar and it looks pretty open right now. 4/6 and 4/15 are busy but good otherwise. So just let me know when works for you guys.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/30/2010 6:45:51 PM  
**Subject:** Re: MY 2011 Lamborghini Information

Thanks Bob.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/30/2010 10:34 AM  
Subject: MY 2011 Lamborghini Information

Hello Jim,

The attached file contains a short overview of the main technical features for the powertrain of 2011 Lamborghini project LB83x (it is the Murcielago successor but the model name is not yet determined).

Lamborghini does not have any new technology for 2011.

For 2012 this vehicle will be equipped as a Flex Fuel Vehicle (FFV), capable of running on E85 and gasoline.

Please let me know if this is sufficient or more detailed information is needed.

Please keep this information confidential

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

[attachment "Lamborghini 2011.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 4/5/2010 5:07:28 PM  
**Subject:** Lamborghini

Bob, I have a couple more questions on the Lamborghini.

- Is there still a manual trans version to be submitted or just an automatic?  
-The FEDV shows a City, HWFE and US06. Why the US06, are you using 5 cycle testing or Derived? If you are using are you going with 5 cycle FE, are you proposing to use SC03 / Cold CO data from the EDV?

Thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 4/8/2010 6:10:45 PM  
**Subject:** Re: VW Group: Supplemental Information Submitted

Thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 04/08/2010 11:12 AM  
Subject: VW Group: Supplemental Information Submitted

Hello Jim,

I have submitted the Supplemental Information to the Verify System for the Audi A8L (TG: BADXV04.23UH) selected for Confirmatory Testing.

Best regards,

Bob

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 4/13/2010 9:20:45 PM  
**Subject:** Re: VW Group: Bugatti Carline

Yes, after reading and discussing with Tom and Dave, I am convinced the Veyron GT is not a different car line.

I'm still looking into it for other instances. Say, if the Audi A8L had a different FE label, I think it would need to be listed separately from the A8.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 04/12/2010 11:11 AM  
Subject: VW Group: Bugatti Carline

Hello Jim,

I need to finish this running change fairly soon. Have you come to any conclusion on our Bugatti carline discussion yet?

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 4/26/2010 3:10:12 PM  
**Subject:** Re: EPA 4WD Dyno Anchors

Yes, I confirmed with the lab supervisor that it is still valid.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 04/22/2010 07:26 AM  
Subject: EPA 4WD Dyno Anchors

Hello Jim,

Audi would like verification that the anchoring system for the EPA's 4WD dyno described in the attachment is still valid.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com  
[attachment "20081022150640433.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 5/24/2010 8:26:02 PM  
**Subject:** Q& tests

Bob, can you send us a note saying VW accepts the FE values of the Audi Q7 EPA tests for our records?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/27/2010 7:05:00 PM  
**Subject:** Re: Supplemental Information for Vehicles Selected for Confirmatory Testing

Thanks for the info. To confirm, are you saying that the shift tables are now in Verify?

I informed the lab to check if it looks okay.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 05/27/2010 02:13 PM  
Subject: Supplemental Information for Vehicles Selected for Confirmatory Testing

Hello Jim,

I have uploaded the required Supplemental Information for Bentley vehicle I.D. BY61021 cfgs 0 and 4 and VW vehicle I.D. VW416 80218 cfg 0.

There are also shift tables uploaded for the FTP and HFET for VW416 80218.  
This VW is in an Audi test group and the required shift tables were not listed in the Audi database in Verify.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/1/2010 8:28:21 PM  
**Subject:** RE: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in AA-C126/AA-OTAOFFICE@EPA)  
[Ex. 7]@vw.com

We're scheduled for the big room by the lobby so phone shouldn't be a problem .

I've had some confusion getting the projector system going in that room so I'll grab a backup unless you're bringing one,

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom Anderson/AA/USEPA/US@EPA, Maria Peralta/AA/USEPA/US@EPA  
**Date:** 06/01/2010 03:53 PM  
**Subject:** RE: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in AA-C126/AA-OTAOFFICE@EPA)

To all:

Attached is an advance copy of the presentation that VW will discuss tomorrow during our meeting on road load determination. Several participants will join by telephone from Germany, so it would be appreciated if a speaker telephone is available. The call-in details are provided below.

[Ex. 7] and I will attend the meeting in person. We expect the following participants, representing Volkswagen and Audi to join by telephone:

**Ex. 7**

Audio Conference Information:

**Non-Responsive**

Best regards,

[Ex. 7]

**Ex. 7**

Engineering and Environmental Office  
Volkswagen Group of America, Inc.

**Ex. 7**

E-Mail: **Ex. 7**@vw.com

<<EPA Road Load Determination Meeting.pdf>>

-----Original Appointment-----

From: Jim Snyder/AA/USEPA/US

Sent: Monday, May 17, 2010 10:42 AM

To: Jim Snyder/AA/USEPA/US; Nevers.Chris@epamail.epa.gov; Ball.Joel@epamail.epa.gov; **Ex. 7**

Wehrly.Linc@epamail.epa.gov; Reineman.Martin@epamail.epa.gov; Healy.Stephen@epamail.epa.gov;

Anderson.Tom@epamail.epa.gov

Cc: Peralta.Maria@epamail.epa.gov

Subject: Invitation: Road Load Determination Meeting w/ VW (Jun 2 09:30 AM EDT in AA-C126/AA-OTAQ-OFFICE@EPA)

When: Wednesday, June 02, 2010 9:30 AM-11:30 AM (GMT-05:00) Eastern Time (US & Canada).

Where: C126

Invitation: Road Load Determination Meeting w/ VW

06/02/2010 -

Chair:

Jim Snyder/AA/USEPA/US

Sent By:

Snyder.Jim@epamail.epa.gov

Location:

C126

Rooms:

AA-C126/AA-OTAQ-OFFICE@EPA

Snyder.Jim@epamail.epa.gov

Jim Snyder has invited you to a meeting. You have not yet responded.

Required:

Chris Nevers/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, **Ex. 7**@vw.com, Linc

Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, Tom

Anderson/AA/USEPA/US@EPA

Optional:

Maria Peralta/AA/USEPA/US@EPA

Description

Hello Linc and Jim:

As we have discussed, Volkswagen representatives are scheduled to meet with you on Wednesday, June 2, 2010 at 09:30 to discuss road load determination and the responses to the questions provided in your e-mail of April 2, 2010. Our representatives are preparing a formal presentation and formulating the responses to the questionnaire.

I had previously stated that one or two people from our local office and another two or three from Germany would attend. Considering the travel time and distance for our German colleagues, I would like to know whether it would be acceptable to have them join the meeting by telephone. I would still attend in person and provide the presentation materials, with the technical experts engaged in the dialogue. I am able to set up a conference call-in number and access code.

I would appreciate your thoughts on this. Please recognize that this request should not be construed as minimizing the importance of this meeting. We look forward to a detailed discussion.

Best regards,

Ex. 7

\_\_ << File: ATT244576.htm >> << File: c104150.ics >> << File: ecblank.gif >> << File: pic00987.gif >>  
[attachment "EPA Road Load Determination Meeting.pdf" deleted by Jim Snyder/AA/USEPA/US]

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/8/2010 4:22:16 PM  
**Subject:** Re: Response to E10 Fuel Question

Thanks, can find out if they mix it in as a batch in the lab or by adding both into the test vehicle's fuel tank ?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** [Ex. 7]@vw.com>  
**Date:** 06/08/2010 07:35 AM  
**Subject:** Response to E10 Fuel Question

Hello Jim,

Here is the response I received from the cert engineer to your question about the blend procedure for the E10 fuel in the flex-fuel Bentley.

The E10 was "splash blended" using Tier2 (9 PSI) test fuel and E85 fuel in our test facility.

Let me know if this answer is sufficient.

Best regards,

**Ex. 7**

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

**Ex. 7**

E-mail: [Ex. 7]@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/8/2010 10:30:36 PM  
**Subject:** missing test data

Bob, for test group BADXV05.2LR8 BI see a test # listed for 50F test but no emission data. Looks like its missing.

Test Number	BADX10006239	Exhaust/Evaporative Test Number Link
Test Procedure	52 - Fed. fuel 50 F exh.	Test Fuel Type 61 - Tier 2 Cert Gasoline
Test Date	2009-08-20	DF Type Mfr. Determined
4WD Dyno	No	State of Charge Delta
MFR Test Comment	4k FED. FUEL 50'F FTP - Tested as AUDI R8 SPYDER CONVERTIBLE 6 spd. autom.	
2 dr. EDV - ETW: 4250		
None		

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** []  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/15/2010 9:29:23 PM  
**Subject:** Re: VW Group: Applications and Certificate Requests Submitted

Sorry, I should have clarified that I was referring to the Bentley FFV confirmatory testing.

Jim Snyder  
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United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 06/15/2010 04:42 PM  
Subject: Re: VW Group: Applications and Certificate Requests Submitted

Okay.

Ben Haynes in the lab reminded me that you need give us instructions if you want to any "learning procedure" performed between test fuels after we drain and fill different fuels on the confirmatory vehicle.

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United States Environmental Protection Agency  
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snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 06/15/2010 03:21 PM  
Subject: VW Group: Applications and Certificate Requests Submitted

Hello Jim,

This is just a "heads-up" for a couple of certificate requests. The application and certificate request for MY

2011 VW test group BVWXV02.0MPI has been submitted earlier today. Submissions for test group BVWXV02.5259 will be completed by Bill Rodgers by Wednesday morning at the latest.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com



**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/21/2010 8:35:48 PM  
**Subject:** Re: VW Group: Certificate Request Submitted and Remaining Certification for MY 2011

Thanks for the summary.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/21/2010 03:50 PM  
Subject: VW Group: Certificate Request Submitted and Remaining Certification for MY 2011

Hello Jim,

I submitted certificate request for carryover test group BVWXV02.03SA.

Here's what's left for the Volkswagen Group initial certification for MY 2011.

Audi test group:  
BADXV04.2375 – carryover application to be submitted sometime in the next two to three weeks

Bentley test group:  
BBEXV06.84LA – currently waiting for confirmatory test decision (Mulsanne)

Lamborghini Test Group:  
BNLXV06.5L83 – waiting for OBD approval

Volkswagen test groups:  
BVWXV02.0U5N – test waiver requests coming this or next week (new Jetta model in this TDI (diesel) test group)  
BVWXV02.03PA – test waiver request coming for CC model with manual transmission this week.  
BVWXV03.6U46 – carryover test group to be submitted sometime in this week – waiting for OBD approval  
BVWXT03.6U76 – carryover test group to be submitted sometime in the next four weeks  
BVWXT03.0HEV – VW's first hybrid – waiting for OBD approval and test results – expected SOP in September

Best regards,

Bob Hart

Robert Hart

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E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/28/2010 8:38:16 PM  
**Subject:** Re: Another Confirmatory Test Waiver Request

Thanks for the note. Saves me time sorting it out.

Jim Snyder  
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United States Environmental Protection Agency  
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snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/28/2010 04:08 PM  
Subject: Another Confirmatory Test Waiver Request

Hello Jim,

Just another "heads-up" for a test waiver request – VW Test Group BVWXV02.03PA (BIN 3 / LEVII SULEV). We're just adding a manual 6 speed VW CC model to the test group before certification. This is not a new worst case. It's just 5-cycle fuel economy tests. This configuration already exists in a BIN 5 / LEVII ULEV test group.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

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Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 7/8/2010 2:36:28 PM  
**Subject:** Re: Certificate for Test Group BVWXV02.0U5N - 2.0l Diesel

its issued

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 07/08/2010 07:44 AM  
Subject: Certificate for Test Group BVWXV02.0U5N - 2.0l Diesel

Hello Jim,

Can you check on the status of the signing of the Certificate for Test Group BVWXV02.0U5N (2.0l Diesel)? Obviously, we can't get an ARB Executive Order until we submit the EPA Certificate to the ARB and their signing procedure takes considerably longer. Any help you can provide to expedite the process will be greatly appreciated.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

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Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** [Ex. 7]@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 7/8/2010 7:55:50 PM  
**Subject:** Fw: SCR Workshop

**Ex. 7**

As one of the manufacturers with diesel vehicles using SCR aftertreatment, has VW/Audi been following the recent events in California regarding SCR systems? ARB has announced a public workshop for July 20th in regard to diesel engines and vehicles using SCR. It is unclear just how light duty will be impacted, but LD may very well follow trends set by heavy duty resulting from this workshop. EPA may be represented at this workshop. Mercedes may be asked what it would take (timing) to implement some of the proposed HD solutions in LD.

Workshop Mail out:

This Mail-out may be accessed at this link:

[http://www.arb.ca.gov/msprog/mailouts/mouts\\_10.htm#msod](http://www.arb.ca.gov/msprog/mailouts/mouts_10.htm#msod)

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[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 7/20/2010 3:46:44 PM  
**Subject:** Re: Lamborghini Catalyst By-Pass Request

Is there supposed to be an attachment of the earlier approvals?

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snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA, "[Ex. 7]@arb.ca.gov">  
**Date:** 07/20/2010 10:24 AM  
**Subject:** Lamborghini Catalyst By-Pass Request

Hello Jim and [Ex. 7]

As you may be aware, I submitted documents through VERIFY and EDMS that describe the function of the exhaust system on the LB83x Lamborghini application. This system includes a bypass of the downstream catalysts under extreme operating conditions. The function is analogous to the system from a past model year Lamborghini Gallardo which was approved by EPA and ARB. Copies of the old approval documents are provided for reference.

I just wanted to send a reminder that the request is in the workflow pending agency review. Your review and response would be appreciated.

Best regards,

[Ex. 7]

---

[Ex. 7]  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
[Ex. 7]  
E-Mail: [Ex. 7]@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Ben Haynes/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/5/2010 3:30:46 PM  
**Subject:** RE: VW Group: Bentley Procedure Request for Refueling Flex-Fuel Test Vehicle

Ben, Bentley's refueling procedure is below.

Bob, we would like to test with E00 first so please have the vehicle setup for gasoline when its delivered.

Thanks.

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snyder.jim@epa.gov

**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 07/28/2010 03:04 PM  
**Subject:** RE: VW Group: Bentley Procedure Request for Refueling Flex-Fuel Test Vehicle

That is an LA4.

The Bentley guys sometimes use some very old terminology.

If I had thought about it, I would have changed it.

I don't know how long you've been around, but that comes from way back in the days of two bag FTP tests.

Bob

**From:** Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Wednesday, July 28, 2010 2:43 PM  
**To:** Hart, Robert (VWoA)  
**Subject:** Re: VW Group: Bentley Procedure Request for Refueling Flex-Fuel Test Vehicle

Don't recall ever hearing of a FTP72. Is that like a H-74 or LA4?

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snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 07/28/2010 11:08 AM  
Subject: VW Group: Bentley Procedure Request for Refueling Flex-Fuel Test Vehicle

Hello Jim,

Since the Bentley Continental flex-fuel vehicle will be tested with both Tier 2 Cert and E85 fuels, to ensure a complete flush of the fuel system between tests, Bentley requests that the EPA use the sequence below when switching fuel types for confirmatory testing.

Fuel drain  
Fill with 40% fuel  
FTP72  
Fuel drain  
Fill with 40% fuel  
FTP72

Please let me know if this is acceptable.

Best regards,

Bob Hart

Robert Hart

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E-mail: robert.hart@vw.com



**To:** [Ex. 7]@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/10/2010 6:14:05 PM  
**Subject:** Re: VW/Audi Meeting with EPA

Sorry, I missed the date in your note. You should have received a re-schedule meeting notice.

Jim Snyder  
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United States Environmental Protection Agency  
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snyder.jim@epa.gov

**From:** [Ex. 7]@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 08/09/2010 01:17 PM  
**Subject:** VW/Audi Meeting with EPA

Hello Jim:

Per our telephone conversation, I am sending a request for a meeting with EPA staff on Thursday afternoon, August 19, 2010.

Preliminary discussion topics would be:

- Worst case emission and emission impact for OBD monitor
- HEV application for certification (example, open points)
- Worst case determination for FE (GHG) and emissions e.g. Start/Stop Switch
- Emission warranty part list for HEV parts and A/C system (GHG)
- Determination of OBD relevance
- Specific Hybrid test issues

I believe that we would need about 2 hours. I will try to refine the list of topics and provide better explanation.

Best regards,

[Ex. 7]

---

[Ex. 7]  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.

[Ex. 7]

E-Mail: **Ex. 7**@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William"  
[William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/11/2010 8:26:19 PM  
**Subject:** Confirmatory cert test data on the 2011 Jetta  
[2011 VW Jetta 1st tests.pdf](#)

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United States Environmental Protection Agency  
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CER

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2010-0231-004		Vehicle ID: VW36100220					
Test Date: 8/11/2010		MFR Name: VOLKSWAGEN					
Key Start / Hot Soak: 08:56:49 / 09:32		MFR Codes: 590 VWX					
Fuel Container ID: F00023		Config #: 00					
Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO					
Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa		Shift Schedule: A09980005					
Calculation Method: Gasoline		Beginning Odometer: 003969.0 MI					
Pretest Remarks:		Drive Schedule: ftp3bag					
		Soak Period: 22.8 hours					
<hr/>							
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	8.301	48.886	0.228	1.206	2.878		
Ambient	3.212	0.157	0.014	0.049	2.239		
Net Concentration	5.379	48.743	0.216	1.161	0.841	4.478	
Remarks:							
<b>Phase 2</b>							
Sample	3.118	2.238	0.007	0.761	2.111		
Ambient	3.276	0.259	0.012	0.047	2.218		
Net Concentration	0.028	1.993	-0.005	0.716	0.019	0.008	
Remarks:							
<b>Phase 3</b>							
Sample	3.836	5.227	0.035	1.061	2.223		
Ambient	3.904	0.585	0.000	0.048	2.227		
Net Concentration	0.242	4.689	0.035	1.016	0.173	0.056	
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<hr/>							
<b>Results</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.051	0.927	0.006	347.2	0.009	0.042 / 0.044	25.487
Phase 2	0.000	0.060	0.000	340.0	0.000	0.000 / 0.000	26.140
Phase 3	0.002	0.089	0.001	302.5	0.002	0.001 / 0.001	29.375
(NMOG=1.04xNMHC)							
Weighted	0.01133	0.24752	0.00153	331.209	0.00258	0.0089 / 0.0093	
<hr/>							
<b>Fuel Economy</b>							
	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	25.46	Dyno #: D002					
Phase 2	26.11	Inertia: 3625					
Phase 3	29.35	EPA Set Co A: 6.21					
		EPA Set Co B: 0.1834					
		EPA Set Co C: 0.01828					
Weighted	26.80	Emissions Bench: D002					

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0231-004

Vehicle ID: VW36100220

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.181	3.315	0.022	1241.0	0.033	0.151	1.071
Phase 2	0.002	0.232	0.000	1310.2	0.001	0.000	
Phase 3	0.008	0.319	0.004	1086.7	0.007	0.002	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.02	29.02	29.02	
Avg Cell Temp (degF)	75.05	75.08	75.20	
Dew Point (degF)	48.86	48.71	48.58	
Specific Humidity (grains/lbm)	52.91	52.62	52.34	
NOx Corr Factor	0.9059	0.9048	0.9037	
CO2 Dilution Factor	11.063	17.605	12.620	
CFV Vmix (scf @68F)	2062.51	3531.37	2063.56	
CVS Flow Rate Avg (scfm)	244.13	243.54	243.44	
Fan Placement: One Fan - Down - Front				
Phase Time (secs)	506.90	870.00	508.59	
Distance (miles)	3.574	3.853	3.592	
Bag Analysis Time (secs)	76.9	73.0	73.0	

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0072	0.191	0.0029	327	0	0.0058

Odometer  
3780 M

MPG  
27.1

MPG is 1.12 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By:

*David L. VanDyke*

Date:

8-11-10

# Paired Data Offset of ≥3% Report

MFR		Num	Load					
VW		590	MPH	EPA Lbs	Mfr. Lbs.	Delta %	target	veh EPA veh Mfr
VID:	VW35100220		10	9.872	1.79	-81.87%	37.64	27.768 35.85
Config 0			20	17.19	9.1	-47.06%	45.7	28.51 36.6
			30	28.164	19.93	-29.24%	57.18	29.016 37.25
			40	42.794	34.28	-19.90%	72.08	29.286 37.8
			50	61.08	52.15	-14.62%	90.4	29.32 38.25
			60	83.022	73.54	-11.42%	112.14	29.118 38.6

Test Numbers      Date      Dyno  
 231004 FTP      8/11/10      D002  
 231005 HFET      8/11/10      D002  
 231006 US06      8/11/10      D002

Offset Summary      Vehicle+Set= Target  
 Quickcheck CD % Diff      #DIV/0!

		<u>EPA</u>	<u>MFG</u>	<u>Mfg Diff%</u>			<u>EPA</u>	<u>MFG</u>	<u>Mfg Diff%</u>
FTP	FE	26.8	27.1	1.12%	US06	FE (Bag2)	30.38	33.9	11.59%
	THC	0.01133	0.0072	-36.45%		FE (Total)	25.84	25.7	-0.54%
	CO	0.24752	0.191	-22.83%		THC	0.00735	0.0271	268.71%
	NOx	0.00153	0.0029	89.54%		CO	0.41884	0.557	32.99%
	CO2	331.209	327.000	-1.27%		NOx	0.00967	0.0197	103.72%
	CH4			#DIV/0!		CO2	343.131	344	0.25%
	NMHC	0.0089	0.0058	-34.83%		CH4			#DIV/0!
					NMHC	0.0053	0.0254	379.25%	

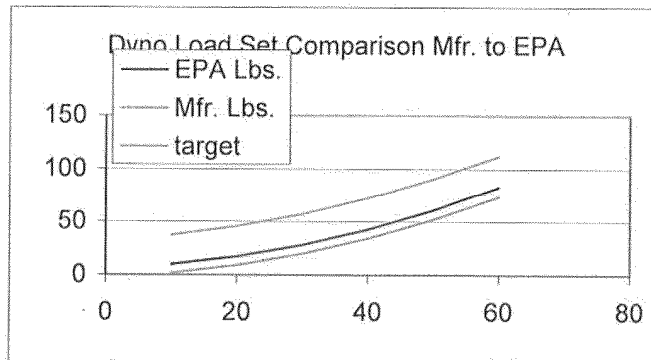
HFET	FE	39.67	42.3	6.63%
	THC	0.001	0.0074	640.00%
	CO	0.114	0.286	150.88%
	NOx	0.002	0.0066	230.00%
	CO2	223.7	209	-6.57%
	CH4			#DIV/0!
	NMHC	0	0.0072	#DIV/0!

Dyno Set			
Coeffs.	EPA	MFG	Target
A	6.21	-2	33
B	0.1834	0.203	0.293
C	0.01828	0.0176	0.0171

Finding:      FTP      Test results and related information indicate results are      valid  
                  HFET      Test results and related information indicate results are      valid  
                  US06      Test results and related information indicate results are      valid

## Observations on finding:

- 1      EPA RLD values 9 lb higher than MFR.
- 2      CO2 values support FE offsets
- 3      There were no errors with these test to account for the FE bias



Results reviewed by

Jul 7 Bm  
 Signature

8/11/10  
 Date

CERT

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0231-005

Vehicle ID: VW36100220

## Test Information



Test Date: 8/11/2010

Key Start: 10:13:11

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel

Test Procedure: 3

Calculation Method: Gasoline

Pretest Remarks:

MFR Name: VOLKSWAGEN

MFR Codes: 590 VWX

Config #: 00

Transmission: AUTO

Shift Schedule: A09980011

Beginning Odometer: 003980.0 MI

Drive Schedule: hwfet\_hwfet

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	3.417	11.864	0.177	1.491	2.141	
Ambient	3.715	0.329	0.031	0.047	2.340	
Net Concentration	0.116	11.572	0.149	1.449	0.061	0.051

Remarks:

### Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.001	0.114	0.002	223.7	0.000	0.000 / 0.000	39.711

(NMOG=1.04xNMHC)

## Fuel Economy

Gasoline MPG  
Phase 1 39.67

## Dyno Settings

Dyno #: D002

Inertia: 3625

EPA Set Co A: 6.21

EPA Set Co B: 0.1834

EPA Set Co C: 0.01828

Emissions Bench: D002

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0231-005

Vehicle ID: VW36100220

## Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.006	1.165	0.023	2292.7	0.004	0.003	1.071

## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.01			
Avg Cell Temp (degF)	75.05			
Dew Point (degF)	49.78			
Specific Humidity (grains/lbm)	54.78			
NOx Corr Factor	0.9132			
CO2 Dilution Factor	8.981			
CFV Vmix (scf @68F)	3054.14			

CVS Flow Rate Avg (scfm) 239.54

Fan Placement: One Fan - Down - Front

Phase Time (secs)	765.01
Distance (miles)	10.248
Bag Analysis Time (secs)	74.5

## MFR Test Results

for Procedure 3 HWFE

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0074	0.286	0.0066	209	0	0.0072

Odometer  
3666 M

MPG  
42.3

MFR Lab: Volkswagen AG, Dept EASZ/1

MPG is 6.62 % higher than EPA MPG

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline


I have validated the data in accordance with the requirements of TP 730

Validated By:

Date:



CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2010-0231-006				Vehicle ID: VW36100220			
<b>Test Information</b>		Test Date: 8/11/2010		MFR Name: VOLKSWAGEN			
		Key Start: 11:00:21		MFR Codes: 590		VWX	
		Fuel Container ID: F00023		Config #: 00			
		Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO			
		Test Procedure: 89 US06		Shift Schedule: A09980041			
		Calculation Method: Gasoline		Beginning Odometer: 004001.0 MI			
		Pretest Remarks:		Drive Schedule: us06warmup_2bagus06			
<b>Bag Data</b>							
		HC-FID	CO	NOx	CO2	CH4	NonMeth HC
<b>Phase 1</b>		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Sample		3.957	32.050	0.488	0.872	2.355	
Ambient		3.224	0.252	0.013	0.045	2.237	
Net Concentration		0.944	31.815	0.476	0.830	0.264	0.661
Remarks:							
<b>Phase 2</b>							
Sample		3.451	10.361	0.181	1.114	2.160	
Ambient		3.241	0.253	0.018	0.045	2.233	
Net Concentration		0.480	10.130	0.165	1.072	0.112	0.359
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
		HC-FID	CO	NOx	CO2	CH4	NMHC / NMOG
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.019	1.275	0.029	523.0	0.006	0.013 / 0.014
Phase 2		0.004	0.176	0.004	292.0	0.001	0.003 / 0.003
Composite		0.00735	0.41884	0.00967	343.131	0.00221	(NMOG=1.04xNMHC) 0.0053 / 0.0055
<b>Fuel Economy</b>							
		Gasoline MPG	Dyno Settings				
Phase 1		16.92	Dyno #: D002				
Phase 2		30.38	Inertia: 3625				
			EPA Set Co A: 6.21				
			EPA Set Co B: 0.1834				
			EPA Set Co C: 0.01828				
Composite		25.84	Emissions Bench: D002				

FE diff 73%

Road load ABC, zero span 1's, tail pipe BP OK

8-11-10

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0231-006

Vehicle ID: VW36100220

## Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.033	2.255	0.051	924.8	0.011	0.023	1.071
Phase 2	0.026	1.093	0.027	1818.4	0.007	0.019	

## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.01	29.01		
Avg Cell Temp (degF)	75.09	75.22		
Dew Point (degF)	49.40	49.66		
Specific Humidity (grains/lbm)	54.01	54.55		
NOx Corr Factor	0.9102	0.9123		
CO2 Dilution Factor	15.304	12.019		
CFV Vmix (scf @68F)	2149.94	3273.54		
CVS Flow Rate Avg (scfm)	541.55	538.12		

Fan Placement: USO6 Only - One Large Fan - Down - Front

Phase Time (secs)	130.00	365.01	108.20
Distance (miles)	1.768	6.226	
Bag Analysis Time (secs)	82.1	266.9	

## MFR Test Results

for Procedure 90 US06

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0271	0.557	0.0197	344	0	0.0254

Odometer  
3687 M

MPG  
25.7

MPG is -0.56 % lower than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By:

*David VanAntwerp*

Date:

8-11-10

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/11/2010 8:34:08 PM  
**Subject:** Re: Diesel Shift Tables

Thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/11/2010 04:00 PM  
Subject: Diesel Shift Tables

Hello Jim,

I will contact Germany for to see if any of the shift tables currently in the system will work for the M6 diesel.  
I should have an answer for you by the end of the week.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** richard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/12/2010 12:35:45 PM  
**Subject:** Fw: Confirmatory cert test data on the 2011 Jetta

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 08/12/2010 08:35 AM -----

From: Jim Snyder/AA/USEPA/US  
To: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 08/11/2010 04:26 PM  
Subject: Confirmatory cert test data on the 2011 Jetta

[attachment "2011 VW Jetta 1st tests.pdf" deleted by Jim Snyder/AA/USEPA/US]


Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov


**To:** "Rodgers, William" [William.Rodgers@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]; ichard.thomas@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/12/2010 7:06:29 PM  
**Subject:** RE: Confirmatory cert test data on the 2011 Tiquan  
[2011 VW Tiquan 1st US06.pdf](#)

The FTP city and Highway are longer due to PM analysis. Should have friday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

CEN

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2010-0242-006				Vehicle ID: VW416 80218			
<div style="display: flex; justify-content: space-between;"> <div>  </div> <div> <b>Test Information</b>            Test Date: 8/11/2010            Key Start: 13:07:03            Fuel Container ID: F00023            Fuel Type: 61 Tier 2 Cert Test Fuel            Test Procedure: 89 US06            Calculation Method: Gasoline            Pretest Remarks:         </div> <div>           MFR Name: AUDI            MFR Codes: 640            Config #: 00            Transmission: AUTO            Shift Schedule: A06400020            Beginning Odometer: 004519.0 MI            Drive Schedule: us06warmup_2bagus06         </div> </div>							
<b>Bag Data</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>
<b>Phase 1</b>		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Sample		7.211	178.654	1.297	0.843	3.130	
Ambient		4.241	1.309	0.022	0.042	2.087	
Net Concentration		3.243	177.429	1.276	0.803	1.178	1.972
Remarks:							
<b>Phase 2</b>							
Sample		5.710	74.000	0.729	1.130	2.499	
Ambient		4.255	1.244	0.026	0.042	2.089	
Net Concentration		1.816	72.862	0.705	1.091	0.588	1.182
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.066	7.335	0.081	522.0	0.028	0.040 / 0.042
Phase 2		0.016	1.315	0.020	309.5	0.006	0.011 / 0.011
Composite		0.02735	2.64948	0.03313	356.599	0.01092	0.0172 / 0.0179
							(NMOG=1.04xNMHC)
<b>Fuel Economy</b>							
		<u>Gasoline MPG</u>	<u>Dyno Settings</u>				
Phase 1		16.64	Dyno #: D329 - FWD				
Phase 2		28.50	Inertia: 3875				
			EPA Set Co A: 15.56				
			EPA Set Co B: -0.1295				
			EPA Set Co C: 0.02613				
Composite		24.59	Emissions Bench: Mexa 7200dle				

NVFEL Laboratory Test Data							CVS	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2010-0242-006				Vehicle ID: VW416 80218				
	<b>Results</b>	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
	Phase 1	0.118	13.029	0.144	927.1	0.050	0.072	1.079
	Phase 2	0.101	8.202	0.122	1930.4	0.038	0.066	
<b>Test Conditions</b>								
		<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
	Barometer (inHg)	28.99	28.99					
	Avg Cell Temp (degF)	74.26	74.44					
	Dew Point (degF)	52.12	52.08					
	Specific Humidity (grains/lbm)	59.86	59.78					
	NOx Corr Factor	0.9336	0.9332					
	CO2 Dilution Factor	15.559	11.776					
	CFV Vmix (scf @68F)	2227.28	3414.34					
	 CVS Flow Rate Avg (scfm)	 564.58	 561.26					
	Fan Placement: USO6 Only - One Large Fan - Down - Front							
	Phase Time (secs)	130.01	364.99	106.70				
	Distance (miles)	1.776	6.237					
	Bag Analysis Time (secs)	81.8	253.4					
 <b>MFR Test Results</b> for Procedure 90 US06								
	<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
	1E+07	0.024	2.92	0.069	352	0	0.0151	
	<u>Odometer</u>	<u>MPG</u>				MFR Lab: Volkswagen AG, Dept EASZ/1		
	4426 M	24.9				Dyno: 21		
	MPG is 1.27 % higher than EPA MPG			Fuel: 61 Tier 2 Cert Gasoline				
I have validated the data in accordance with the requirements of TP 730								
Validated By: _____		52727			Date: 8/11/10			

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/13/2010 7:04:30 PM  
**Subject:** Re: Diesel Shift Tables

Bob, Thanks for the help on the diesel. Hope you are feeling better today.

I talked to the lab and they said they'd release the Tiquan data today but still haven't seen them as of 1:30. I'll check one more time.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 08/13/2010 08:47 AM  
**Subject:** Diesel Shift Tables

Hello Jim,

According to our diesel cert engineer, shift tables 590 0035 (FTP) and 590 0036 (HFET) can be used as indicated in the MY 2009 Application Common Sections (Section 12). These shift tables should already be in the EPA Lab database. They are the standard VW gasoline engine M6 shift tables.

Here are the upshift points by speed.

UP-SHIFT

1 - 2 15 mph  
2 - 3 25 mph  
3 - 4 40 mph  
4 - 5 47 mph  
5 - 6 52 mph

Due to the gear ratios in the diesel transmission the following declutch points must be used:

DECLUTCH

6 - 0 30 mph  
5 - 0 25mph  
4 - 0 20mph

I am still waiting for the US06 schedule.

Best regards,



Bob Hart

From: Hart, Robert (VWoA)  
Sent: Wednesday, August 11, 2010 4:00 PM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: Diesel Shift Tables

Hello Jim,

I will contact Germany for to see if any of the shift tables currently in the system will work for the M6 diesel.  
I should have an answer for you by the end of the week.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/13/2010 7:36:09 PM  
**Subject:** Re: VW36100220 Release  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

I tried to sign off on it but I can't find the paperwork, I think Van Amberg has it. I'll leave a note for Vince to sign off early Monday morning but call before you come out to verify.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
Date: 08/13/2010 08:28 AM  
Subject: VW36100220 Release

Hello Jim,  
Can you please make arrangements to release the Jetta #VW36100220 so we can pick it up after we deliver the other Jetta (VW36100250) on Monday morning the 16th.

Thanks,  
Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/13/2010 8:03:47 PM  
**Subject:** Tiquan test results  
[2011 VW Tiquan FTP and 2nd US06 wPM.pdf](#)

Showed up but Hwy is missing.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

CERT  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0242-004

Vehicle ID: VW416 80218

## Test Information



Test Date: 8/11/2010

MFR Name: AUDI

Key Start / Hot Soak: 09:51:45 / 10:07

MFR Codes: 640

ADX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: AUTO

Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa

Shift Schedule: A06400035

Calculation Method: Gasoline

Beginning Odometer: 004484.0 MI

Pretest Remarks:

Drive Schedule: flp3bag

Soak Period: 19.8 hours

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	13.519	68.890	0.872	0.977	3.267	
Ambient	5.364	1.272	0.029	0.045	2.392	
Net Concentration	8.549	67.712	0.845	0.935	1.051	7.415

Remarks:

### Phase 2

Sample	3.492	2.513	0.300	0.685	2.342	
Ambient	3.535	0.232	0.023	0.044	2.439	
Net Concentration	0.139	2.293	0.278	0.643	0.028	0.109

Remarks:

### Phase 3

Sample	3.222	8.950	0.102	0.888	2.600	
Ambient	3.122	0.287	0.026	0.044	2.503	
Net Concentration	0.307	8.683	0.078	0.847	0.264	0.022

Remarks:

### Phase 4

Sample	
Ambient	
Net Concentration	

Remarks: This test has particulate results.

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.110	1.756	0.033	381.2	0.016	0.095 / 0.099	23.132
Phase 2	0.003	0.095	0.017	418.5	0.001	0.002 / 0.002	21.237
Phase 3	0.004	0.224	0.003	342.9	0.004	0.000 / 0.000	25.904
Weighted	0.02533	0.47508	0.01677	389.924	0.00465	(NMOG=1.04xNMHC) 0.0210 / 0.0218	

## Fuel Economy

	Gasoline MPG	Dyno Settings	Dyno #: D329 - FWD
Phase 1	23.11		Inertia: 3875
Phase 2	21.22		EPA Set Co A: 15.56
Phase 3	25.88		EPA Set Co B: -0.1295
			EPA Set Co C: 0.02613
Weighted	22.73		Emissions Bench: Mexa 7200dle

v100414 - d329

EPAVDAEm100811092037

Page 1 of 2

Print Time 12-Aug-2010 14:32

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0242-004

Vehicle ID: VW416 80218

Results	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.394	6.297	0.119	1366.8	0.056	0.342	1.079
Phase 2	0.011	0.365	0.067	1609.7	0.003	0.009	
Phase 3	0.014	0.806	0.011	1235.2	0.014	0.001	



### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.00	29.00	28.99	
Avg Cell Temp (degF)	74.45	74.83	74.93	
Dew Point (degF)	50.78	51.10	50.94	
Specific Humidity (grains/lbm)	56.92	57.60	57.28	
NOx Corr Factor	0.9217	0.9244	0.9231	
CO2 Dilution Factor	13.605	19.540	15.063	
CFV Vmix (scf @68F)	2807.29	4807.71	2800.51	
Total Vmix (scf@68F)	2820.65	4830.71	2813.85	
CVS Flow Rate Avg (scfm)	332.55	331.49	331.68	

Fan Placement: One Fan - Down - Front

Phase Time (secs)	506.50	870.20	506.60
Distance (miles)	3.585	3.846	3.602
Bag Analysis Time (secs)	953.6	146.8	91.7

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0202	0.49	0.02	378	0	0.015

Odometer  
4239 M

MPG  
23.4

MPG is 2.96 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline


I have validated the data in accordance with the requirements of TP 730

Validated By: \_\_\_\_\_

62797

Date: \_\_\_\_\_

8/12/10

NVFEL Laboratory Test Data							PARTICULATE	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2010-0242-004			Vehicle ID: VW416 80218					
	Test Date: 8/11/2010		MFR Name: AUDI					
	Key Start: 09:51:45 / 10:07		MFR Codes: 640      ADX					
	Fuel Container ID: F00023		Config #: 00					
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO					
	Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa		Shift Schedule: A06400035					
	Calculation Method: Gasoline		Beginning Odometer: 004484.0 MI					
	Pretest Remarks:		Drive Schedule: flp3bag Soak Period: 19.8 hours					
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / mi	Filter comment
<u>Phase 1</u>	A	38186	143.6335	143.6477	0.01418	8.970	2.502	
	B	38187	145.8188	145.8274	0.00857	5.408	1.508	
	C	38188	142.9500	142.9646	0.01459	9.269	2.586	
Remarks:								
<u>Phase 2</u>	A	38189	143.0893	143.0980	0.00868	5.465	1.421	
	B	38190	143.3554	143.3700	0.01458	9.216	2.396	
	C	38191	145.1365	145.1445	0.00797	5.013	1.303	
Remarks:								
<u>Phase 3</u>	A	38192	146.4261	146.4349	0.00876	5.532	1.536	
	B	38193	145.7238	145.7358	0.01197	7.562	2.099	
	C	38194	145.6262	145.6389	0.01267	8.042	2.233	
Remarks:								
<u>Phase 4</u>								
Remarks: <u>This test has particulate results.</u>								
<u>Average Results</u>					Net Wt mg	Total Mass mg	Total Mass mg / mi	
Phase 1					0.01245	7.882	2.199	
Phase 2					0.01041	6.565	1.707	
Phase 3					0.01113	7.046	1.956	
All filter weights are corrected for buoyancy.								
Weighted All Filters:							1.87745	
<u>Reference Filter Stability Check</u>			Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Stability Check PASS/FAIL	Dyno #: D329 - FWD	
2% of Avg Net or 0.01 mg		No.					Inertia: 3875	
0.01		1	143.82859	143.82809	-0.00050	PASS	EPA Set Co A: 15.56	
		2	143.60554	143.60704	0.00150	PASS	EPA Set Co B: -0.1295	
							EPA Set Co C: 0.02613	
Emissions Bench Mexa 7200dle								
v100414 - d329    EPAVDAEm100811092037			Page 1 of 2			Print Time 12-Aug-2010 14:32		

**NVFEL Laboratory Test Data****PARTICULATE****Final Laboratory Test Results- Refer to VERIFY Reports for Official Data**

Test Number: 2010-0242-004

Vehicle ID: VW416 80218

WEIGHING CHAMBER	Buoyancy	Operator	Chamber Temp	Dew Point	Barometer	Last Change in Status	
Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp	
Pre-test	8/10/10 14:21	1.0011129	022298	71.5	49.1	29.04	NORM @ 08/06/10 18:29:09
Post-test	8/12/10 11:57	1.0011080	022298	71.4	48.9	28.91	NORM @ 08/06/10 18:29:09

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.00	29.00	28.99	
Avg Cell Temp (degF)	74.45	74.83	74.93	
Dew Point (degF)	50.78	51.10	50.94	
Specific Humidity (grains/lbm)	56.92	57.60	57.28	
NOx Corr Factor	0.9217	0.9244	0.9231	
Dilution Factor	13.61	19.54	15.06	
CFV Vmix (scf @68F)	2807.29	4807.71	2800.51	
Sample Volume A (scf @68F)	4.460	7.671	4.457	
Sample Volume B (scf @68F)	4.468	7.645	4.454	
Sample Volume C (scf @68F)	4.439	7.679	4.433	
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	4.455	7.665	4.448	
Total Vmix (scf @68F)	2820.65	4830.71	2813.85	
Phase Time (sec)	506.50	870.20	506.60	
Distance (miles)	3.585	3.846	3.602	
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	41.7	41.3	41.3	
PSU Dil Air B (degC)	43.8	43.3	43.2	
PSU Dil Air C (degC)	40.1	39.9	40.1	
PSU Filter A (degC)	45.0	47.0	44.9	
PSU Filter B (degC)	46.7	46.0	45.4	
PSU Filter C (degC)	44.6	44.6	44.9	
PSU Dil Flow A (lpm)	29.9	30.0	29.9	
PSU Dil Flow B (lpm)	30.0	29.9	29.9	
PSU Dil Flow C (lpm)	29.9	30.0	29.9	
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

I have validated the data in accordance with the requirements of TP 730

Validated By: 62787 Date: 8/12/10

CERT  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0242-007

Vehicle ID: VW416 80218

## Test Information



Test Date: 8/11/2010

Key Start: 13:56:49

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel

Test Procedure: 90 US06

Calculation Method: Gasoline

Pretest Remarks:

MFR Name: AUDI

MFR Codes: 640

ADX

Config #: 00

Transmission: AUTO

Shift Schedule: A06400020

Beginning Odometer: 004535.0 MI

Drive Schedule: us06\_us06

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	3.864	49.568	0.703	1.014	2.253	
Ambient	3.176	1.154	0.030	0.043	1.994	
Net Concentration	0.930	48.502	0.675	0.974	0.411	0.486

Remarks:

### Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 4

Sample  
Ambient  
Net Concentration

Remarks: This test has particulate results.

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.011	1.130	0.024	356.5	0.005	0.006 / 0.006	24.811

(NMOG=1.04xNMHC)

## Fuel Economy

Gasoline MPG  
Phase 1 24.79

## Dyno Settings

Dyno #: D329 - FWD

Inertia: 3875


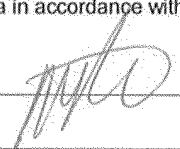
EPA Set Co A: 15.56


EPA Set Co B: -0.1295

EPA Set Co C: 0.02613

Emissions Bench: Mexa 7200dle



NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2010-0242-007				Vehicle ID: VW416 80218			
<b>Results</b>	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
 Phase 1	0.086	9.041	0.192	2853.6	0.044	0.045	1.079
<b>Test Conditions</b>							
	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>			
Barometer (inHg)	28.98						
Avg Cell Temp (degF)	74.80						
Dew Point (degF)	51.39						
Specific Humidity (grains/lbm)	58.27						
NOx Corr Factor	0.9271						
CO2 Dilution Factor	13.146						
CFV Vmix (scf @68F)	5637.95						
Total Vmix (scf@68F)	5653.71						
CVS Flow Rate Avg (scfm)	562.30						
Fan Placement: US06 Only - One Large Fan - Down - Front							
Phase Time (secs)	601.60						
Distance (miles)	8.004						
Bag Analysis Time (secs)	85.0						
<b>MFR Test Results</b> for Procedure 90 US06							
<u>MFR Number</u> 1E+07	<u>HC</u> 0.024	<u>CO</u> 2.92	<u>NOx</u> 0.069	<u>CO2</u> 352	<u>NMOG</u> 0	<u>NonMeth HC</u> 0.0151	
<u>Odometer</u> 4426 M	<u>MPG</u> 24.9				MFR Lab: Volkswagen AG, Dept EASZ/1		
MPG is 0.46 % higher than EPA MPG				Dyno: 21 Fuel: 61 Tier 2 Cert Gasoline			
I have validated the data in accordance with the requirements of TP 730							
Validated By: 				Date: 8.12.10			

NVFEL Laboratory Test Data							PARTICULATE	
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Number: 2010-0242-007			Vehicle ID: VW416 80218					
	Test Date: 8/11/2010		MFR Name: AUDI					
	Key Start: 13:56:49		MFR Codes: 640      ADX					
	Fuel Container ID: F00023		Config #: 00					
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO					
	Test Procedure: 90 US06		Shift Schedule: A06400020					
	Calculation Method: Gasoline		Beginning Odometer: 004535.0 MI					
Pretest Remarks:			Drive Schedule: us06_us06					
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / mi	Filter comment
<u>Phase 1</u>	A	38180	147.4178	147.4265	0.00867	9.342	1.167	
	B	38181	145.2217	145.2308	0.00909	9.785	1.223	
	C	38182	145.6573	145.6693	0.01199	12.902	1.612	
Remarks:								
<u>Phase 2</u>								
Remarks:								
<u>Phase 3</u>								
Remarks:								
<u>Phase 4</u>								
Remarks: <u>This test has particulate results.</u>								
<u>Average Results</u>					Net Wt mg	Total Mass mg	Total Mass mg / mi	
Phase 1					0.00992	10.676	1.334	
All filter weights are corrected for buoyancy.								
<u>Reference Filter Stability Check</u>			Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Stability Check	Dyno #: D329 - FWD	
2% of Avg Net or 0.01 mg			No.			PASS/FAIL	Inertia: 3875	
0.01			1	143.82709	143.82767	0.00058	PASS	EPA Set Co A: 15.56
			2	143.60404	143.60853	0.00449	PASS	EPA Set Co B: -0.1295
								EPA Set Co C: 0.02613
Emissions Bench Mexa 7200dle								
v100414 - d329    EPAVDAEm100811132623			Page 1 of 2			Print Time 12-Aug-2010 13:44		

**NVFEL Laboratory Test Data****PARTICULATE****Final Laboratory Test Results- Refer to VERIFY Reports for Official Data**

Test Number: 2010-0242-007

Vehicle ID: VW416 80218

<b>WEIGHING CHAMBER</b>	<b>Buoyancy</b>	<b>Operator</b>	<b>Chamber Temp</b>	<b>Dew Point</b>	<b>Barometer</b>	<b>Last Change in Status</b>
Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
<b>Pre-test</b> 8/10/10 13:35	1.0011129	000000	71.5	49.1	29.04	NORM @ 08/06/10 18:29:09
<b>Post-test</b> 8/12/10 12:54	1.0011079	022298	71.4	48.8	28.91	NORM @ 08/06/10 18:29:09

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.98			
Avg Cell Temp (degF)	74.80			
Dew Point (degF)	51.39			
Specific Humidity (grains/lbm)	58.27			
NOx Corr Factor	0.9271			
Dilution Factor	13.15			
CFV Vmix (scf @68F)	5637.95			
Sample Volume A (scf @68F)	5.250			
Sample Volume B (scf @68F)	5.250			
Sample Volume C (scf @68F)	5.253			
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	5.251			
Total Vmix (scf @68F)	5653.71			
Phase Time (sec)	601.60			
Distance (miles)	8.004			
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	41.5			
PSU Dil Air B (degC)	43.4			
PSU Dil Air C (degC)	40.4			
PSU Filter A (degC)	45.4			
PSU Filter B (degC)	46.5			
PSU Filter C (degC)	45.1			
PSU Dil Flow A (lpm)	29.7			
PSU Dil Flow B (lpm)	29.7			
PSU Dil Flow C (lpm)	29.6			
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

I have validated the data in accordance with the requirements of TP 730

Validated By: \_\_\_\_\_

Date: \_\_\_\_\_

v100414 - d329 EPAVDAEm100811132623

Page 2 of 2

Print Time 12-Aug-2010 13:44

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/13/2010 8:12:27 PM  
**Subject:** RE: Tiquan test results

Looks like they are in Verify now too.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/13/2010 04:10 PM  
Subject: RE: Tiquan test results

Thanks, Jim.

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Friday, August 13, 2010 4:04 PM  
To: Rodgers, William  
Cc: Hart, Robert (VWoA)  
Subject: Tiquan test results


Showed up but Hwy is missing.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William"  
[William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/17/2010 2:59:23 PM  
**Subject:** EPA hwy results of 2011 Tiquan  
[2011 VW Tiquan HWY.pdf](#)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2010-0242-005			Vehicle ID: VW416 80218				
<b>Test Information</b>							
	Test Date: 8/11/2010		MFR Name: AUDI				
	Key Start: 11:10:38		MFR Codes: 640      ADX				
	Fuel Container ID: F00023		Config #: 00				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Transmission: AUTO				
	Test Procedure: 3		Shift Schedule: A06400036				
	Calculation Method: Gasoline		Beginning Odometer: 004495.0 MI				
Pretest Remarks:			Drive Schedule: hwfet_hwfet				
<b>Bag Data</b>							
	HC-FID	CO	NOx	CO2	CH4	NonMeth HC	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	3.461	6.688	0.480	1.155	2.469		
Ambient	2.535	0.141	0.026	0.042	2.126		
Net Concentration	1.145	6.559	0.456	1.117	0.526	0.577	
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks: This test has particulate results.							
<b>Results</b>							
	HC-FID	CO	NOx	CO2	CH4	NMHC / NMOG	Vol MPG
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.008	0.089	0.009	237.6	0.004	0.004 / 0.004	37.402
(NMOG=1.04xNMHC)							
<b>Fuel Economy</b>							
	Gasoline MPG	Coastdown secs:	17.76	Dyno Settings	Dyno #: D329 - FWD		
Phase 1	37.36		17.78		Inertia: 3875		
			17.76		EPA Set Co A: 15.56		
					EPA Set Co B: -0.1295		
					EPA Set Co C: 0.02613		
			17.76		Emissions Bench: Mexa 7200die		
v1004114 - d329    EPAVDAEm100811104024    Page 1 of 2    Print Time 16-Aug-2010 13:03							

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0242-005

Vehicle ID: VW416 80218

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.079	0.909	0.096	2432.9	0.042	0.040	1.079

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.00			
Avg Cell Temp (degF)	74.57			
Dew Point (degF)	51.50			
Specific Humidity (grains/lbm)	58.47			
NOx Corr Factor	0.9279			
CO2 Dilution Factor	11.588			
CFV Vmix (scf @68F)	4185.47			
Total Vmix (scf@68F)	4205.44			
CVS Flow Rate Avg (scfm)	328.23			

Fan Placement: One Fan - Down - Front

Phase Time (secs)	765.10
Distance (miles)	10.241
Bag Analysis Time (secs)	74.8

### MFR Test Results

for Procedure 3 HWFE

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0081	0.22	0.021	246	0	0.0046

Odometer	MPG
4266 M	36

MPG is -3.65 % lower than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1


Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By: \_\_\_\_\_

Date: \_\_\_\_\_

NVFEL Laboratory Test Data						PARTICULATE		
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data								
Test Information		Test Number: 2010-0242-005			Vehicle ID: VW416 80218			
	Test Date: 8/11/2010			MFR Name: AUDI				
	Key Start: 11:10:38			MFR Codes: 640      ADX				
	Fuel Container ID: F00023			Config #: 00				
	Fuel Type: 61 Tier 2 Cert Test Fuel			Transmission: AUTO				
	Test Procedure: 3			Shift Schedule: A06400036				
Calculation Method: Gasoline			Beginning Odometer: 004495.0 MI					
Pretest Remarks:			Drive Schedule: hwfet_hwfet					
All filter weights are corrected for buoyancy.								
Particulate	Filter Sampler	Filter No.	Tare (Pre Wt)	Gross (Post Wt)	Net Wt mg	Total Mass mg	Total Mass mg / mi	Filter comment
<u>Phase 1</u>	A	38177	147.5069	147.5235	0.01666	10.443	1.020	
	B	38178	146.5628	146.5791	0.01627	10.210	0.997	
	C	38179	144.7838	144.7892	0.00546	3.501	0.342	
Remarks:								
<u>Phase 2</u>								
Remarks:								
<u>Phase 3</u>								
Remarks:								
<u>Phase 4</u>								
Remarks: <u>This test has particulate results.</u>								
Average Results					Net Wt	Total Mass	Total Mass	
					mg	mg	mg / mi	
Phase 1					0.01280	8.051	0.786	
All filter weights are corrected for buoyancy.								
Reference Filter Stability Check			Tare	Gross	Net Wt	Stability Check	Dyno #:	
2% of Avg Net or 0.01 mg			(Pre Wt)	(Post Wt)	mg	PASS/FAIL	D329 - FWD	
0.01	No.						Inertia: 3875	
	1		143.82709	143.82896	0.00187	PASS	EPA Set Co A: 15.56	
	2		143.60404	143.60691	0.00287	PASS	EPA Set Co B: -0.1295	
							EPA Set Co C: 0.02613	
Emissions Bench Mexa 7200dle								
v100414 - d329    EPAVDAEm100811104024			Page 1 of 2			Print Time 16-Aug-2010 13:04		



**NVFEL Laboratory Test Data****PARTICULATE**

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0242-005

Vehicle ID: VW416 80218

<b>WEIGHING CHAMBER</b>		<u>Buoyancy</u>	<u>Operator</u>	<u>Chamber Temp</u>	<u>Dew Point</u>	<u>Barometer</u>	<u>Last Change in Status</u>
	Timestamp	Factor	(id)	(°F)	(°F)	("Hg)	Status @ timestamp
<b>Pre-test</b>	8/10/10 13:35	1.0011129	022298	71.5	49.1	29.04	NORM @ 08/06/10 18:29:09
<b>Post-test</b>	8/12/10 14:21	1.0011071	022298	71.6	48.7	28.90	NORM @ 08/06/10 18:29:09

**Test Conditions**

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.00			
Avg Cell Temp (degF)	74.57			
Dew Point (degF)	51.50			
Specific Humidity (grains/lbm)	58.47			
NOx Corr Factor	0.9279			
Dilution Factor	11.59			
CFV Vmix (scf @68F)	4185.47			
Sample Volume A (scf @68F)	6.710			
Sample Volume B (scf @68F)	6.700			
Sample Volume C (scf @68F)	6.564			
Sample Volume D (scf @68F)				
Sample Volume Average (scf @68F)	6.658			
Total Vmix (scf @68F)	4205.44			
Phase Time (sec)	765.10			
Distance (miles)	10.241			
PSU Probe A (degC)				
PSU Probe B (degC)				
PSU Probe C (degC)				
PSU Dil Air A (degC)	41.5			
PSU Dil Air B (degC)	43.3			
PSU Dil Air C (degC)	40.2			
PSU Filter A (degC)	45.3			
PSU Filter B (degC)	47.8			
PSU Filter C (degC)	45.7			
PSU Dil Flow A (lpm)	29.8			
PSU Dil Flow B (lpm)	29.8			
PSU Dil Flow C (lpm)	29.9			
PSU A Proportionality				
PSU B Proportionality				
PSU C Proportionality				

I have validated the data in accordance with the requirements of TP 730

Validated By: \_\_\_\_\_

Date: \_\_\_\_\_

v100414 - d329 EPAVDAEm100811104024

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# Paired Data Offset of ≥3% Report

MFR		Num	Load						
Audi		640	MPH	EPA Lbs	Mfr. Lbs.	Delta %	target	veh EPA	veh Mfr
VID:	VW416 80218		10	16.878	24.34	44.21%	40.81	23.932	16.47
Config 0			20	23.422	29.7	26.80%	49.56	26.138	19.86
			30	35.192	40.08	13.89%	63.25	28.058	23.17
			40	52.188	55.48	6.31%	81.88	29.692	26.4
			50	74.41	75.9	2.00%	105.45	31.04	29.55
			60	101.858	101.34	-0.51%	133.96	32.102	32.62

Test Numbers      Date      Dyno  
 242004 FTP      8/11/10      D329  
 242005 HFET      8/11/10      D329  
 US06

Vehicle+Set= Target

## Offset Summary

Quickcheck CD % Diff      -4.63%

		EPA	MFG	Mfg Diff%			EPA	MFG	Mfg Diff%
FTP	FE	22.73	23.4	2.95%	US06	FE (Bag2)			#DIV/0!
	THC	0.02533	0.0202	-20.25%		FE (Total)			#DIV/0!
	CO	0.47508	0.49	3.14%		THC			#DIV/0!
	NOx	0.01677	0.02	19.26%		CO			#DIV/0!
	CO2	389.924	378.000	-3.06%		NOx			#DIV/0!
	CH4			#DIV/0!		CO2			#DIV/0!
	NMHC	0.021	0.015	-28.57%		CH4			#DIV/0!
						NMHC			#DIV/0!

HFET	FE	37.36	36	-3.64%
	THC	0.008	0.0081	1.25%
	CO	0.089	0.22	147.19%
	NOx	0.009	0.021	133.33%
	CO2	237.6	246	3.54%
	CH4			#DIV/0!
	NMHC	0.004	0.0046	15.00%

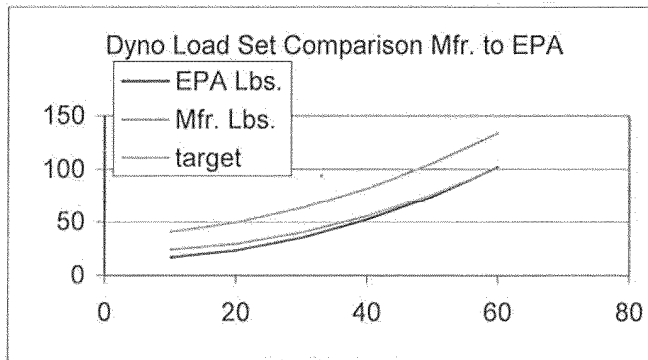
## Dyno Set

Coeffs.	EPA	MFG	Target
A	15.56	24	37
B	-0.1295	-0.217	0.134
C	0.02613	0.0251	0.0247

Finding:      FTP      Test results and related information indicate results are      valid  
                  HFET      Test results and related information indicate results are      valid  
                  US06

## Observations on finding:

- 1      EPA RLD values within 1 lb.
- 2
- 3



Results reviewed by

De J. M.  
 Signature

8/16/10  
 Date

**To:** CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Ball/OU=AA/O=USEPA/C=US@EPA;Leonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; eonard.Kata@vw.com;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Martin Reineman/OU=AA/O=USEPA/C=US@EPA;CN=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]; N=Tom Anderson/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/17/2010 3:02:58 PM  
**Subject:** Audi Meeting with EPA: Discussion topics

Audi AG has provided a more refined list of discussion topics. These are shown below:

#### EPA Meeting

- \* Idle stop system – Last mode strategy
- \* Worst case mode for emission certification and OBD emission impact tests
- \* EPA position on Evap Test procedure for PHEV
- \* HEV application for certification
- \* New emission related components for MY 2012 GHG
- \* MIL on and additional information / text message
- \* Audi Hybrid and battery cooling at the dynamometer
- \* Clarification of dynamometer test mode for future vehicles

See you on Thursday.

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/17/2010 8:55:11 PM  
**Subject:** Re: Diesel Shift Tables

Bob, since this diesel uses the same schedules as the gas engines, is the US06 the same as the Tiquan we just tested? It uses 0035, 0036, and 0020 for US06.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/13/2010 08:47 AM  
Subject: Diesel Shift Tables

Hello Jim,

According to our diesel cert engineer, shift tables 590 0035 (FTP) and 590 0036 (HFET) can be used as indicated in the MY 2009 Application Common Sections (Section 12). These shift tables should already be in the EPA Lab database. They are the standard VW gasoline engine M6 shift tables.

Here are the upshift points by speed.

UP-SHIFT

1 - 2 15 mph  
2 - 3 25 mph  
3 - 4 40 mph  
4 - 5 47 mph  
5 - 6 52 mph

Due to the gear ratios in the diesel transmission the following declutch points must be used:

DECLUTCH

6 - 0 30 mph  
5 - 0 25mph  
4 - 0 20mph

I am still waiting for the US06 schedule.

Best regards,

Bob Hart

From: Hart, Robert (VWoA)  
Sent: Wednesday, August 11, 2010 4:00 PM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: Diesel Shift Tables

Hello Jim,

I will contact Germany for to see if any of the shift tables currently in the system will work for the M6 diesel.  
I should have an answer for you by the end of the week.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/18/2010 3:55:21 PM  
**Subject:** Re: Retest Request for VW Tiguan - VW416 80218 cfg. 0

Bob, do you know if Bentley is considering a retest on the US06? If so, we should do it before we switch fuels on monday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Reisner, Axel, Dr. (EASZ/1)" <axel.reisner@volkswagen.de>  
Date: 08/18/2010 09:01 AM  
Subject: Retest Request for VW Tiguan - VW416 80218 cfg. 0

Hello Jim,

I informed Vince Mazaitis that Volkswagen has requested a retest of the FTP and HWFET for the VW Tiguan – VW416 80218 cfg. 0.  
Both fuel economy values are more than 3% different from the manufacturer test results.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326


Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Rodgers, William"  
[William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/19/2010 12:18:28 PM  
**Subject:** Fw: VW36100250 Lab Test Report  
[VW36100250 8-18-10.pdf](#)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 08/19/2010 08:17 AM -----

**From:** Vincent Mazaitis/AA/USEPA/US  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 08/19/2010 06:50 AM  
**Subject:** VW36100250 Lab Test Report

CER

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Information			Test Number: 2010-0225-005				
	Test Date: 8/18/2010		Vehicle ID: VW36100250				
	Key Start / Hot Soak: 07:10:58 / 09:42		MFR Name: VOLKSWAGEN				
	Fuel Container ID: F00023		MFR Codes: 590 VWX				
	Fuel Type: 61 Tier 2 Cert Test Fuel		Config #: 00				
	Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa)		Transmission: AUTO				
	Calculation Method: Gasoline		Shift Schedule: A09980005				
Pretest Remarks:		Beginning Odometer: 003378.0 MI		Drive Schedule: ftp3bag			
				Soak Period: 16.6 hours			
<b>Bag Data</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>
		(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)
Phase 1							
Sample		12.580	49.678	1.200	0.864	2.841	
Ambient		2.536	0.000	0.017	0.044	2.025	
Net Concentration		10.208	49.678	1.184	0.822	0.947	9.126
Remarks:							
Phase 2							
Sample		3.281	3.056	0.028	0.549	2.232	
Ambient		2.467	0.000	0.016	0.044	2.023	
Net Concentration		0.915	3.056	0.013	0.507	0.293	0.580
Remarks:							
Phase 3							
Sample		3.555	7.269	0.139	0.760	2.305	
Ambient		2.421	0.000	0.027	0.044	2.010	
Net Concentration		1.271	7.269	0.113	0.718	0.409	0.804
Remarks:							
Phase 4							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>							
		<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>
		(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)
Phase 1		0.128	1.261	0.045	328.1	0.014	0.115 / 0.119
Phase 2		0.018	0.124	0.001	322.9	0.007	0.012 / 0.012
Phase 3		0.016	0.186	0.004	288.6	0.006	0.010 / 0.011
Weighted		0.04056	0.37686	0.01086	314.550	0.00802	(NMOG=1.04xNMHC) 0.0326 / 0.0339
<b>Fuel Economy</b>							
		<u>Gasoline MPG</u>	<u>Dyno Settings</u>				
Phase 1		26.87	Dyno #: D329 - FWD				
Phase 2		27.49	Inertia: 3250				
Phase 3		30.74	EPA Set Co A: 5.22				
			EPA Set Co B: 0.379				
			EPA Set Co C: 0.01389				
Weighted		28.13	Emissions Bench: Mexa 7200sle				



# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-005

Vehicle ID: VW36100250

## Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.459	4.512	0.160	1174.0	0.049	0.411	1.143
Phase 2	0.071	0.476	0.003	1239.4	0.026	0.045	
Phase 3	0.058	0.664	0.015	1031.2	0.021	0.036	

## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.16	29.16	29.16	
Avg Cell Temp (degF)	75.29	74.74	74.50	
Dew Point (degF)	49.33	48.94	48.67	
Specific Humidity (grains/lbm)	53.59	52.80	52.26	
NOx Corr Factor	0.9086	0.9055	0.9035	
CO2 Dilution Factor	15.397	24.372	17.604	
CFV Vmix (scf @68F)	2755.09	4720.13	2770.28	

CVS Flow Rate Avg (scfm)	326.30	325.79	328.10	
--------------------------	--------	--------	--------	--

Fan Placement: One Fan - Down - Front

Phase Time (secs)	506.60	869.30	506.60	
Distance (miles)	3.578	3.838	3.573	
Bag Analysis Time (secs)	878.8	1103.5	121.0	

## MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0347	0.45	0.0132	324	0	0.0302

Odometer	MPG	PM
3164 M	27.3	0.002

MPG is -2.96 % lower than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By: \_\_\_\_\_

Date: \_\_\_\_\_

8-18-10

CERT  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-006

Vehicle ID: VW36100250

## Test Information



Test Date: 8/18/2010

Key Start: 08:30:01

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel

Test Procedure: 3

Calculation Method: Gasoline

Pretest Remarks:

MFR Name: VOLKSWAGEN

MFR Codes: 590 VWX

Config #: 00

Transmission: AUTO

Shift Schedule: A09980011

Beginning Odometer: 003389.0 MI

Drive Schedule: hwfet\_hwfet

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	3.283	5.820	0.089	1.055	2.429	
Ambient	2.430	0.000	0.014	0.043	2.001	
Net Concentration	1.045	5.820	0.076	1.016	0.585	0.376

Remarks:

### Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.007	0.078	0.002	213.3	0.004	0.002 / 0.003	41.662

(NMOG=1.04xNMHC)

## Fuel Economy

	Gasoline MPG
Phase 1	41.62

## Dyno Settings

Dyno #: D329 - FWD  
Inertia: 3250  
EPA Set Co A: 5.22  
EPA Set Co B: 0.379  
EPA Set Co C: 0.01389

Emissions Bench: Mexa 7200sie

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-006

Vehicle ID: VW36100250

## Results



	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.071	0.795	0.015	2180.9	0.046	0.025	1.143

## Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.14			
Avg Cell Temp (degF)	75.04			
Dew Point (degF)	49.09			
Specific Humidity (grains/lbm)	53.14			
NOx Corr Factor	0.9068			
CO2 Dilution Factor	12.688			
CFV Vmix (scf @68F)	4144.50			
CVS Flow Rate Avg (scfm)	325.02			

Fan Placement: One Fan - Down - Front

Phase Time (secs)	765.10
Distance (miles)	10.226
Bag Analysis Time (secs)	105.2

## MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0112	0.11	0	221	0	0.0073

<u>Odometer</u>	<u>MPG</u>	PM
3175 M	40.1	

0.018

MFR Lab: Volkswagen AG, Dept EASZ/1

MPG is -3.66 % lower than EPA MPG

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By:

Date: 8-18-10

CERT

## NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-004

Vehicle ID: VW36100250

## Test Information

Test Date: 8/18/2010

MFR Name: VOLKSWAGEN

Key Start: 09:16:57

MFR Codes: 590

VWX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: AUTO

Test Procedure: 89 US06

Shift Schedule: A09980041

Calculation Method: Gasoline

Beginning Odometer: 003410.0 MI

Pretest Remarks:

Drive Schedule: us06warmup\_2bagus06



## Bag Data

## Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	5.469	157.201	0.245	0.808	3.131	
Ambient	2.490	0.000	0.038	0.043	1.975	
Net Concentration	3.133	157.201	0.209	0.768	1.277	1.674

Remarks:

## Phase 2

Sample	5.576	238.253	0.144	1.052	3.356	
Ambient	2.492	0.000	0.044	0.043	1.976	
Net Concentration	3.284	238.253	0.103	1.013	1.539	1.525

Remarks:

## Phase 3

Sample	
Ambient	
Net Concentration	

Remarks:

## Phase 4

Sample	
Ambient	
Net Concentration	

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.063	6.387	0.013	490.7	0.030	0.034 / 0.035	17.750
Phase 2	0.029	4.242	0.003	283.3	0.016	0.013 / 0.014	30.652
Composite	0.03652	4.71769	0.00494	329.293	0.01881	(NMOG=1.04xNMHC) 0.0179 / 0.0187	

## Fuel Economy

	Gasoline MPG	Dyno Settings	Dyno #: D329 - FWD
Phase 1	17.73	Inertia: 3250	
Phase 2	30.62	EPA Set Co A: 5.22	
		EPA Set Co B: 0.379	
		EPA Set Co C: 0.01389	
Composite	26.39	Emissions Bench: Mexa 7200sle	

v100414 - d329 EPAVDAEm100818085336

Page 1 of 2

Print Time 18-Aug-2010 09:45

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0225-004

Vehicle ID: VW36100250

## Results

	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.112	11.321	0.022	869.7	0.053	0.060	1.143
Phase 2	0.180	26.387	0.017	1762.3	0.098	0.084	



## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.14	29.14		
Avg Cell Temp (degF)	74.48	75.20		
Dew Point (degF)	49.09	49.20		
Specific Humidity (grains/lbm)	53.14	53.37		
NOx Corr Factor	0.9068	0.9077		
CO2 Dilution Factor	16.249	12.447		
CFV Vmix (scf @68F)	2184.30	3359.11		
CVS Flow Rate Avg (scfm)	553.69	552.18		

Fan Placement: US06 Only - One Large Fan - Down - Front

Phase Time (secs)	130.01	364.99	106.70
Distance (miles)	1.772	6.220	
Bag Analysis Time (secs)	110.2	321.8	

## MFR Test Results

for Procedure 90 US06

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0297	2.24	0.0067	296	0	0.0208

Odometer  
3305 M

MPG  
29.7

MFR Lab: Volkswagen AG, Dept EASZ/1

MPG is 12.53 % higher than EPA MPG

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

*Road load ABC, zero span 1's, tail pipe BP OK DV 8-18-10*  
I have validated the data in accordance with the requirements of TP 1730

Validated By: *[Signature]*

Date: *8-18-10*

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/19/2010 9:36:52 PM  
**Subject:** Re: VW Group: Retest Request for Volkswagen Test Vehicle VW36100250 cfg. 0

done

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/19/2010 12:36 PM  
Subject: VW Group: Retest Request for Volkswagen Test Vehicle VW36100250 cfg. 0

Hello Jim,

Volkswagen requests a retest for both the HWFET and US06 for test vehicle VW36100250 cfg. 0.

Volkswagen has accepted the test results for the FTP for that vehicle configuration.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/20/2010 2:55:46 PM  
**Subject:** Re: VW Group: Bentley US06 Retest Request Recinded

I canceled the retest and informed the lab to go straight to the refueling.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/20/2010 10:38 AM  
Subject: VW Group: Bentley US06 Retest Request Recinded

Hello Jim,

Bentley has decided to cancel the request for a retest of the US06 for test vehicle BY61021 cfg. 0 and accept the original test results.

Please call me if you have any questions.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

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Auburn Hills, MI 48326

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Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 8/23/2010 5:57:11 PM  
**Subject:** Re: Cert Request Submitted

Yep, on this afternoon's agenda .

Also saw the Bentley conditional.

Jim Snyder  
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Compliance and Innovative Strategies Division  
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(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2010 01:40 PM  
Subject: Cert Request Submitted

Hello Jim,

Just another "heads up" for a certificate request if you haven't already seen it. The certificate request for test group BVWXT03.6U76 was submitted on 19-Aug-10.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com



**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/24/2010 5:13:48 PM  
**Subject:** Re: VW Group: Letter to Allow Porsche to Use VW Test Results

Looks good.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/23/2010 03:17 PM  
Subject: VW Group: Letter to Allow Porsche to Use VW Test Results

Hello Jim,

The attached letter has been submitted through the Verify System.  
The letter grants permission for Porsche to use VW test results from the MY 2011 VW Touareg Hybrid in test group BVWXT03.0HEV for the emissions certification of the Porsche Cayenne Hybrid.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com  
[attachment "CBI\_BVWX\_CORRES\_LETTER01\_R00.PDF" deleted by Jim Snyder/AA/USEPA/US]

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/25/2010 12:26:47 PM  
**Subject:** Fw: VW416 80218 : 2nd test results  
[VW416 80218 8-24-10.pdf](#)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 08/25/2010 08:26 AM -----

From: Vincent Mazaitis/AA/USEPA/US  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/25/2010 07:07 AM  
Subject: VW416 80218

Jim,

Please find enclosed the Laboratory re-test results for the subject vehicle.

Thanks,

Vince Mazaitis

CERT

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0242-009

Vehicle ID: VW416 80218

### Test Information



Test Date: 8/24/2010

MFR Name: AUDI

Key Start / Hot Soak: 10:36:56 / 09:39

MFR Codes: 640

ADX

Fuel Container ID: F00023

Config #: 00

Fuel Type: 61 Tier 2 Cert Test Fuel

Transmission: MANUAL

Test Procedure: 21 Federal fuel 2-day exhaust (w/can loa

Shift Schedule: A06400035

Calculation Method: Gasoline

Beginning Odometer: 004558.0 MI

Pretest Remarks:

Drive Schedule: ftp3bag

Soak Period: 20.0 hours

### Bag Data

#### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	19.686	99.822	1.436	1.386	3.159	
Ambient	8.005	0.350	0.002	0.044	2.017	
Net Concentration	12.516	99.509	1.434	1.346	1.352	11.068

Remarks:

#### Phase 2

Sample	4.616	22.700	0.104	0.962	1.898	
Ambient	4.801	0.347	0.000	0.043	1.983	
Net Concentration	0.160	22.379	0.104	0.922	0.058	0.098

Remarks:

#### Phase 3

Sample	3.294	23.324	0.619	1.260	2.089	
Ambient	3.154	0.365	0.006	0.043	1.950	
Net Concentration	0.437	22.993	0.614	1.222	0.323	0.092

Remarks:

#### Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

### Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol MPG (mpg)
Phase 1	0.117	1.874	0.040	398.4	0.015	0.103 / 0.107	22.130
Phase 2	0.002	0.672	0.005	435.0	0.001	0.001 / 0.002	20.388
Phase 3	0.004	0.431	0.017	359.7	0.003	0.001 / 0.001	24.671
Weighted	0.02655	0.85499	0.01523	406.743	0.00449	(NMOG=1.04xNMHC) 0.0224 / 0.0233	

### Fuel Economy

	Gasoline MPG	Dyno Settings	Dyno #
Phase 1	22.11		D002
Phase 2	20.37		Inertia: 3875
Phase 3	24.65		EPA Set Co A: 15.56
			EPA Set Co B: -0.1295
			EPA Set Co C: 0.02613
Weighted	21.75		Emissions Bench: D002

v100414 - d002 EPAVDAEm100824102110

Page 1 of 2

Print Time 24-Aug-2010 11:39

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0242-009

Vehicle ID: VW416 80218

### Results



	HC-FID (grams)	CO (grams)	NOx (grams)	CO2 (grams)	CH4 (grams)	NMHC (grams)	Meth Response
Phase 1	0.421	6.757	0.143	1436.7	0.053	0.372	1.071
Phase 2	0.009	2.603	0.018	1684.9	0.004	0.006	
Phase 3	0.015	1.554	0.061	1297.3	0.012	0.003	

### Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	29.14	29.14	29.14	
Avg Cell Temp (degF)	75.27	75.30	75.40	
Dew Point (degF)	47.22	47.48	46.95	
Specific Humidity (grains/lbm)	49.49	50.00	48.99	
NOx Corr Factor	0.8929	0.8948	0.8911	
CO2 Dilution Factor	9.588	13.894	10.609	
CFV Vmix (scf @68F)	2059.68	3528.02	2049.83	
CVS Flow Rate Avg (scfm)	244.67	243.37	243.45	
Fan Placement: One Fan - Down - Front				
Phase Time (secs)	505.10	869.80	505.20	
Distance (miles)	3.606	3.873	3.607	
Bag Analysis Time (secs)	74.9	74.0	74.0	

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0202	0.49	0.02	378	0	0.015

Odometer  
4239 M

MPG  
23.4

MFR Lab: Volkswagen AG, Dept EASZ/1

MPG is 7.60 % higher than EPA MPG

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By:

Date: 8-24-10

CERT  
CVS

# NVFEL Laboratory Test Data

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2010-0242-010

Vehicle ID: VW416 80218

## Test Information



Test Date: 8/24/2010

Key Start: 12:13:15

Fuel Container ID: F00023

Fuel Type: 61 Tier 2 Cert Test Fuel

Test Procedure: 03 HWFET (hwfetprep\_hwfet)

Calculation Method: Gasoline

Pretest Remarks:

MFR Name: AUDI

MFR Codes: 640

ADX

Config #: 00

Transmission: MANUAL

Shift Schedule: A06400036

Beginning Odometer: 004569.0 MI

Drive Schedule: hwfet\_hwfet

## Bag Data

### Phase 1

	HC-FID (ppmC)	CO (ppm)	NOx (ppm)	CO2 (%)	CH4 (ppm)	NonMeth HC (ppmC)
Sample	2.971	6.434	0.200	1.063	1.962	
Ambient	2.798	0.480	0.018	0.043	1.950	
Net Concentration	0.395	5.992	0.184	1.023	0.167	0.216

Remarks:

### Phase 2

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 3

Sample  
Ambient  
Net Concentration

Remarks:

### Phase 4

Sample  
Ambient  
Net Concentration

Remarks:

## Results

	HC-FID (gpm)	CO (gpm)	NOx (gpm)	CO2 (gpm)	CH4 (gpm)	NMHC / NMOG (gpm)	Vol.MPG (mpg)
Phase 1	0.003	0.093	0.004	248.4	0.001	0.002 / 0.002	35.777

(NMOG=1.04xNMHC)

## Fuel Economy

	Gasoline MPG	Coastdown secs:		Dyno Settings	Dyno #:
Phase 1	35.74	17.49	17.49		D002
		17.49	17.48		Inertia: 3875
					EPA Set Co A: 15.56
					EPA Set Co B: -0.1295
					EPA Set Co C: 0.02613
			17.49		Emissions Bench: D002

# NVFEL Laboratory Test Data

CVS

Final Laboratory Test Results- Refer to VERIFY Reports for Official Data  
Test Number: 2010-0242-010

Vehicle ID: VW416 80218

## Results



	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.031	0.951	0.043	2551.5	0.015	0.017	1.071

## Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	29.13			
Avg Cell Temp (degF)	75.41			
Dew Point (degF)	47.29			
Specific Humidity (grains/lbm)	49.65			
NOx Corr Factor	0.8935			
CO2 Dilution Factor	12.595			
CFV Vmix (scf @68F)	4811.95			
CVS Flow Rate Avg (scfm)	377.41			

Fan Placement: One Fan - Down - Front  
Phase Time (secs) 764.99  
Distance (miles) 10.274  
Bag Analysis Time (secs) 73.9

## MFR Test Results

for Procedure 3 HWFE

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.0081	0.22	0.021	246	0	0.0046

Odometer  
4266 M

MPG  
36

MPG is 0.72 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

I have validated the data in accordance with the requirements of TP 730

Validated By: 62459 Date: 8-24-10

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/25/2010 10:34:15 PM  
**Subject:** Re: VW Group: Test Type Question  
([embedded image](#))  
([embedded image](#))

Verify doesn't have a separate procedure name for it. Its still called a FTP, only difference is there are 2 hot stablilized bags instead of double weighting the bag 2. On my side I have it specified as 4 bags to denote it but you may not see that.

I also requested PM measurement but Verify erased it. Its on my hard copy but not in the system so I have to re-request it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/25/2010 03:57 PM  
Subject: VW Group: Test Type Question

Hello Jim,

The tests listed for the Touareg Hybrid (T.G.: BVWXT03.0HEV) in Verify are 1 FTP, 1 HWFE and 2 US06 (I'm guessing one 2-Bag and one 1-Bag w/PM). See highlighted info below.

The FTP is listed as type 21 which is a standard Federal fuel 2-day exhaust (w/can load).

Is this correct or will it be a UDDS? Is this just a limitation of the Verify System - maybe it hasn't been coded to indicate a UDDS test yet?

Bob Hart

Vehicle selected for Test VW526710023, Supplemental Information needed - Message

From: Verify Administrator  
Subject: Vehicle selected for Test VW526710023, Supplemental Information needed  
Date: Fri 8/13/2010 1:26 PM

Your recent submission has been selected by the EPA for Confirmatory Testing for the following vehicle:  
Manufacturer: VWX Vehicle ID: VW526710023 Vehicle Configuration: 0 Please submit your supplemental information as soon as possible so that the EPA can schedule a test date. Below are the specific tests that will be run: 3 - HWFE 61 - Tier 2 Cert Gasoline 21 - Federal fuel 2-day exhaust (w/can load) 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline 90 - US06 61 - Tier 2 Cert Gasoline

Manufacturer Code: VWX  
Vehicle ID: VW526710023  
Vehicle Configuration #: 0  
Test Group Name: BVWXT03.0HEV  
Transaction Identifier: \_edc7f15d-c98b-40ac-9520-7f64fb8b3c88

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com



**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 8/25/2010 11:02:08 PM  
**Subject:** Re: Lambo Catalyst Bypass

I found the old and new writeups describing the Lamborghini proposal for the catalyst bypass system and read them.. Given that 2 of the 3 catalysts are still active in the system even during bypass, the catalyst efficiency is limited during high load/rpm due to residence time and A/F ratio, and the benefits of preventing overtemperaturing of the catalyst, I approve the use of the proposed bypass system.

On page 9, the graphs shows that the bypass opens at 60% load at 3750 rpm. The following temperature map shows this as the very beginning of elevated catalyst temperatures. Please remind Lamborghini that the catalyst bypass is justified for temperature protection but I consider their lower cut point generous.

Jim Snyder  
Light-Duty Vehicle Group  
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United States Environmental Protection Agency  
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snyder.jim@epa.gov

**From:** "Kata, Leonard" <Leonard.Kata@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 08/23/2010 11:37 AM  
**Subject:** Lambo Catalyst Bypass

Hello Jim:

Thanks for setting up the meeting with Audi last week, As always, we come away from these meetings having learned a lot.

As we discussed last week, I have submitted a couple of documents regarding the Lamborghini proposal through VERIFY. The first was the initial request, and the second was in response to your question about the prior approval.

We are getting close for production timing, so an EPA response would be appreciated.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.

Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Reisner, Axel, Dr. (EASZ/1)" [axel.reisner@volkswagen.de]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/2/2010 8:38:37 PM  
**Subject:** Vw test results pending

Vince, I won't be in Friday. If the results on today's test of the VW Jetta VW36100250 are released, please email them to Axel (email above) so he can determine whether to stay or head home.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA;"Hart, Robert (VWoA)" [Robert.Hart@vw.com]; Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** "Reisner, Axel, Dr. (EASZ/1)" [axel.reisner@volkswagen.de]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/2/2010 8:45:42 PM  
**Subject:** Re: Vw test results pending

Looks like the data is already in Verify.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Jim Snyder/AA/USEPA/US  
**To:** Vincent Mazaitis/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA  
**Cc:** "Reisner, Axel, Dr. (EASZ/1)" <axel.reisner@volkswagen.de>  
**Date:** 09/02/2010 04:38 PM  
**Subject:** Vw test results pending

Vince, I won't be in Friday. If the results on today's test of the VW Jetta VW36100250 are released, please email them to Axel (email above) so he can determine whether to stay or head home.

Jim Snyder  
Light-Duty Vehicle Group  
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(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/13/2010 6:23:48 PM  
**Subject:** Verify issue

Bob, I talked to a Verify person about what you found. They recommended that you contact VerifyHelp and tell them what you found.

Jim Snyder  
Light-Duty Vehicle Group  
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United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 9/13/2010 6:45:07 PM  
**Subject:** test schedule update

Bob, I just heard from Vince that the Jetta did not prep today so it won't get tested tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/14/2010 12:20:00 PM  
**Subject:** RE: test schedule update

No, I just forgot that its only a hot test. Schedule came this morning and it is running today,

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: <Snyder.Jim@epamail.epa.gov>  
Date: 09/13/2010 02:51 PM  
Subject: RE: test schedule update

Hello Jim,

Is it standard EPA practice to do a prep the day before a US06? If so, do we have a new test date?

Bob

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Monday, September 13, 2010 2:45 PM  
To: Hart, Robert (VWoA)  
Subject: test schedule update

Bob, I just heard from Vince that the Jetta did not prep today so it won't get tested tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/14/2010 7:33:46 PM  
**Subject:** Jetta testing

The lab is running behind today. They haven't run the Jetta yet. They may not get to it today after all.

Jim Snyder  
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**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 9/15/2010 1:34:07 PM  
**Subject:** jetta

They plan to retest it late morning/early afternoon.

Jim Snyder  
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**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/16/2010 5:38:21 PM  
**Subject:** jetta departing

Bob, I signed off on veh.250, Ben said he would move it out for pickup. Vince will be in if there are any unexpected issues while picking it up tomorrow.

Jim Snyder  
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snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/16/2010 9:29:59 PM  
**Subject:** 3rd us06 results  
[jetta 2011 US06 3rd test.pdf](#)

Jim Snyder  
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United States Environmental Protection Agency  
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snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/21/2010 4:02:29 PM  
**Subject:** Re: VW Group: MY 2011 VW Touareg Hybrid

Thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 09/21/2010 11:51 AM  
Subject: VW Group: MY 2011 VW Touareg Hybrid

Hello Jim,

I uploaded a revised MY 2011 VW Group Common Sections today. You should now be able to find the Evap Family description.  
The pages that were updated are listed on Section 15VW Page 1.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

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Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** CN=Ben Haynes/OU=AA/O=USEPA/C=US@EPA;CN=David  
Bochenek/OU=AA/O=USEPA/C=US@EPA[]; N=David  
Bochenek/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]; N=Don  
Louwsma/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 10/1/2010 3:46:13 PM  
**Subject:** charger on Bentley

Bentley has requested that a charger be put on their vehicle and I have approved it. The instructions on hooking up a charger are with the vehicle.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 10/4/2010 7:24:26 PM  
**Subject:** Bentley testing

Bob, the Bentley will run some time after noon so tell Sebastian to be here by 12.

Have him call Vince or me when he gets here.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 10/6/2010 3:47:07 PM  
**Subject:** Re: EPA Certificate for Test Group BADXV04.2375  
([embedded image](#))

Sorry, that priority project has flared up again. I asked Steve to look it over today.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 10/06/2010 09:42 AM  
Subject: EPA Certificate for Test Group BADXV04.2375

Hello Jim,

If you read this before you check your voice mail, you can ignore the message I left because it is the same subject.

I need to know the status of the EPA Certificate for Test Group BADXV04.2375. We need it as soon as possible.

Cars are built 

Ex. 4 - CBI
-------------

LD Certificate Request received - Message

From: Verify Administrator  
Subject: LD Certificate Request received  
Date: Mon 9/27/2010 3:50 PM

Your recent LD Certificate Request submission has been received by the EPA and you will be notified if any additional actions on your part are required. A Submission Processing Report and any requested dataset reports can be found on the status history page. The status history page can be reached by clicking on the link near the bottom of this Inbox message.

The following is a summary of the processing report:

Total Datasets Submitted: 1

Accepted Datasets: 1

Rejected Datasets: 0

Test Group Name: BADXV04.2375

Transaction Identifier: \_a09cc86a-037c-4c70-b008-98e3123ea623

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.

3800 Hamlin Road

Auburn Hills, MI 48326

Phone: (248) 754-4224

Fax: (248) 754-4207

E-mail: robert.hart@vw.com



**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 10/19/2010 1:49:44 PM  
**Subject:** Re: Bentley Mulsanne Tests

I talked to the lab and they will put the charger on it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** Vincent Mazaitis/AA/USEPA/US@EPA  
**Date:** 10/15/2010 07:32 AM  
**Subject:** Bentley Mulsanne Tests

Hello Jim,

Bentley has requested a retest for the FTP and US06 tests. Please let me know when the tests have been scheduled.

Bentley has accepted the highway test results.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** "Thomas, Richard" [Richard.Thomas@vw.com]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 10/28/2010 1:24:55 PM  
**Subject:** Re: Bentley Mulsanne Release

I signed the vehicle release. Let us know when you plan on picking it up and I'll warn Ben.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Thomas, Richard" <Richard.Thomas@vw.com>  
Date: 10/28/2010 08:24 AM  
Subject: Bentley Mulsanne Release

Hello Jim,

Bentley has accepted the test results for the Mulsanne (vehicle ID: 15113) and it can be released for pick up.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 11/15/2010 8:03:41 PM  
**Subject:** 1st test results of Hybrid  
[1st tests 2011 VW hybrid.pdf](#)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/16/2010 3:30:27 PM  
**Subject:** Fw: Confirmatory Test Date assigned for (VW526710023 / 0)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov  
----- Forwarded by Jim Snyder/AA/USEPA/US on 11/16/2010 10:29 AM -----

From: VerifyAdministrator@verify-as1.epa.gov  
To: Jim Snyder/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA  
Date: 11/16/2010 10:03 AM  
Subject: Confirmatory Test Date assigned for (VW526710023 / 0)

PLEASE DO NOT REPLY TO THIS EMAIL!

A Confirmatory Test Date has been set for the following vehicle :

Test Date : 11/19/2010  
Manufacturer: VWX  
Vehicle ID: VW526710023  
Vehicle Configuration: 0

**To:** Leonard.Kata@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/16/2010 6:04:21 PM  
**Subject:** Pre-cert mtg  
[cert preview mtg reqmnts.pdf](#)

Hi Len, I was just talking to Bob Hart and he said VW is planning on releasing some 2012MY vehicles start of January. I thought I'd remind you that prior to any 2012 certification, it is required to have a Pre-cert mtg which includes VW's proposed strategy for meeting the GHG requirements. The GHG plans are to show that you have a viable plan worked out. We realize this is new and plans may change but we want to verify that the manufactures understand it correctly.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY  
2565 PLYMOUTH ROAD  
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF  
AIR AND RADIATION

October 6, 2003

Dear Manufacturer:

CCD-03-12 (LDV/LDT/ICI/LIMO)

Subject: Model Year 2005 Compliance Preview Meeting

EPA is conducting its annual review of your certification, in-use compliance and fuel economy plans for the 2005 model year and would like to meet with you to facilitate the early resolution of any concerns and expedite the certification process. At your convenience, please contact your EPA certification representative to schedule a date for this meeting. Discussion topics will include your compliance plans for the upcoming model year and any new product offerings and/or technologies you may be intending to introduce. Enclosure I contains a detailed list of the topics we would like you to discuss.

As in the past, for our laboratory planning purposes, we are also asking you to submit your projections for EPA confirmatory testing for the remainder of 2003 and the entire 2004 calendar years. Enclosure II is a spreadsheet for you to complete and return to your EPA certification representative.

If you are unable to meet in person with us, please submit a written response to the items contained in Enclosures I and II. If you have already had a 2005 preview meeting with EPA, please schedule another brief meeting (or send a written response) to address or update topics that were not covered in the first meeting.

We look forward to meeting with you.

Sincerely,

Merrylin Zaw-Mon, Director  
Certification and Compliance Division  
Office of Transportation and Air Quality

Enclosures: Enclosure I - Model Year (MY) 2005 Discussion Topics for the Annual Certification Preview Meeting for Light-Duty and Heavy-Duty Vehicles (chassis dynamometer certified)

Enclosure II - EPA Light-duty & Heavy-duty Chassis Dynamometer Manufacturer Test Request Projections



Printed on Recycled Paper

## **Enclosure I**

### **Model Year (MY) 2005 Discussion Topics for the Annual Certification Preview Meeting for Light-Duty and Heavy-Duty Vehicles (chassis dynamometer certified)**

#### **1. Structure of Your Organization**

- 1.1 Provide an overview of your organization detailing the functions and staff responsible for fuel economy, certification and in-use programs.

#### **2. Product Line Plans**

- 2.1 Detail your product plans for MY 2005 to include information regarding any new technologies, car lines, engines, transmissions, emission controls, fuel economy improvements and/or any other technology that may be introduced.
- 2.2 Will you certify any new sport utility vehicles, mini-vans, or non-conventional trucks (e.g., passenger-oriented pick-ups with a small cargo bed) that have not been previously certified? Detail your reasoning for certifying any of these as light-duty vehicles, light-duty trucks, or heavy-duty trucks within the definitions contained in 40CFR 1803-01.

#### **3. Certification Issues**

- 3.1 Describe your MY 2005 light-duty vehicles, light-duty trucks, or heavy-duty trucks (chassis dynamometer) testing and certification plans and identify any critical dates related to them. Identify any early MY 2005 certification plans with dates. Provide your EPA certification representative with your Test Waiver Request plans using the table in Enclosure II within three weeks of your preview meeting, or sooner.
- 3.2 Provide an overview of your certification program for MY 2005. Include a list of Test Groups and Durability Groups. For heavy-duty chassis certified vehicles, provide information about the emission standards to which these vehicles will be certified, including the option, FELs averaging, banking and trading, transferring credits, etc.
- 3.3 Advise the status of your durability/in-use program. Identify any trends. Provide an overview of the in-use test programs conducted in the past year and provide information concerning programs planned for 2005 and 2006 MY vehicles.
- 3.4 Summarize your phase-in plans for Tier 2, Interim Non-Tier 2, Clean fuel Vehicle Heavy-duty (chassis certified) vehicles and California LEV-II vehicles.
- 3.5 Describe any plans to certify alternative fueled vehicles, diesel vehicles, hybrid

and fuel cell vehicles, and new technology (e.g., direct injection) for 2005-2007 model years.

Describe any special testing methods that will be employed.

- 3.6 Describe your phase-in plans for ORVR indicating what MY 2005 Test Groups/Evap Families will incorporate ORVR.
- 3.7 Do you have any OBD issues? Do you have any Test Groups that will not require California OBD approval?
- 3.8 Do you have any NLEV issues? Explain how you will meet the fleet average NMOG emission standards described in 40 CFR 86.1711-99 for 2005 model year vehicles. The MY 2003 annual report is due May 1, 2004. Will you end up with NLEV credits at the end of the year? If not, please explain your plans to purchase credits.
- 3.9 Please provide an overview of the laboratory equipment which will be used to measure emissions from Tier 2 vehicles and zero evaporative vehicles.

#### 4. Fuel Economy Issues

- 4.1 Will you have any driver selectable devices or multi-mode transmissions in your product line that have not previously received EPA approval? Please describe how they operate. Are any vehicles equipped with any driver selectable devices that prevent the engagement of certain gears, prevent lock-up, or prevent overdrive operation? If so, does the driver selectable device reset to the enable position after the ignition is turned off?
- 4.2 Describe the method of operation for any semi-automatic transmissions in your product offering that may be easily operated in either automatic or manual mode. Explain how such vehicles will be tested for fuel economy purposes.
- 4.3 Discuss any fuel economy labeling or CAFÉ issues.

#### 5. In-use Performance and Compliance Program

- 5.1 Provide an overview for any in-use testing programs conducted in the past year for MY 1998-2003 vehicles other than for alternative durability and CAP 2000 testing programs. How many vehicles were tested?
- 5.2 Provide an overview of the process your company uses to submit emission related defect reports to EPA (ref. 40 CFR 85.1901). Describe whom is responsible for submitting these reports to EPA and their time line for doing so. Describe your



process for notifying owners/leasees of recall actions.

- 5.3 Explain the methods used to track emission related component failures as they occur in the field. Describe how you ensure that EPA is notified of a defect within fifteen (15) days after an emission component has twenty-five (25) warranty claims for the same model year vehicle(s) and/or engine(s).
- 5.4 Provide an overview of the process your company uses to correct defects after they have been discovered. Discuss the elements involved in redesign, manufacture, distribute replacements to manufacturing, distributors, dealers, etc. Include the method of communicating the corrections and instructions for implementing them to all involved parties.

## 6. Other Issues

- 6.1 Discuss any other pertinent information not previously outlined above that may be related to the certification process, in-use compliance and fuel economy.

### EPA Light-duty& Heavy-duty Chassis Dynamometer Mfr. Test Request Projections

## 2004 CALENDAR YEAR

2003

**FTP  
Twin Roll  
Gasoline\***

**SFTP**  
**Single Roll**  
**Gasoline\***

2-D Evap  
Any  
Any

**SFTP**  
**Single Roll**  
**Any**

FTP  
Any  
Non-gasoline\*\*

Oct 1-15
Oct 16-31
Nov 1-15
Nov 16-30
Dec 1-15
Dec 16-31


2004

Jan 1-15
Jan 16-31
Feb 1-15
Feb 16-29
Mar 1-15
Mar 16-31
Apr 1-15
Apr 16-30
May 1-15
May 16-31
Jun 1-15
Jun 16-30
July 1-15
July 16-31
Aug 1-15
Aug 16-31
Sept 1-15
Sept 16-30
Oct 1-15
Oct 16-31
Nov 1-15
Nov 16-30
Dec 1-15
Dec 16-31

[illegible]

\*Gasoline includes Indolene and Phase II test fuel

**\*\*Please indicate the type of fuel which will be used.**

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** "Kohnen, Christoph (VWGoA)" [christoph.kohnen@vw.com]; N=David Good/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA[];  
N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 11/23/2010 9:58:02 PM  
**Subject:** Re: 2012 Volkswagen Pre-Certification Document and Meeting Request

Thanks Len, December 1 is okay with me. I will check the schedule with the other guys and schedule a meeting time.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Kata, Leonard" <Leonard.Kata@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** David Good/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, "Kohnen, Christoph (VWGoA)" <christoph.kohnen@vw.com>  
**Date:** 11/19/2010 04:50 PM  
**Subject:** 2012 Volkswagen Pre-Certification Document and Meeting Request

Hello Jim:

Thus far, we have completed preparation of the 2012 Volkswagen pre-certification letter, in accordance with the existing "Dear Manufacturer" guidance letter on this topic (CCD-03-12). Our letter will be filed with the VERIFY system today.

In the letter we state that we will follow with our 2012 Pre-Model Year GHG Report. We are finishing this right now and intend to submit the report to the VERIFY system in the very near future.

We also state that we would like to schedule a meeting. At the meeting we would walk through the pre-certification letter and attachments and present to 2012 pre-model year GHG report. As mentioned the documents will be available for your prior review.

With the Thanksgiving Holiday next week, staff schedules are somewhat mixed, as might also be the case at EPA. Therefore, I would like to propose a meeting with EPA on Wednesday, December 1, 2010.

Please let me know if this date is acceptable.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 12/1/2010 3:00:18 PM  
**Subject:** RE: Invitation: VW Pre-Cert mtg and 2012 pre-model year GHG report (Dec 1 01:00 PM EST in AA-C126/AA-OTAQ-OFFICE@EPA)

Hi Len, got your voice mail and handout. Everything is fine at our end, looking forward to the meeting.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** CN=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 12/6/2010 4:28:01 PM  
**Subject:** VW hybrid FTP

Bob, I received your voice mail regarding VW accepting the ftp FE numbers. I canceled the re-test. But I haven't seen an official email from you, have you sent it?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** Leonard.Kata@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 12/6/2010 8:41:45 PM  
**Subject:** ADP

Len, I talked to Arvon about ADP and VW uses the SRC process which doesn't require approval. So all I need is a letter saying you are using EPA's SRC and we are all set on this.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 12/14/2010 6:35:04 PM  
**Subject:** Re: FW: Confernece Call - Audi

Next Tuesday is mtg from 9 to 10 again so I guess monday morning. How about 10:00?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/14/2010 01:27 PM  
Subject: FW: Confernece Call - Audi

Hi Jim:

I received your message that the proposed time for tomorrow is not good. Unfortunately, Lothar is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,

Len

From: Kata, Leonard  
Sent: Friday, December 10, 2010 7:57 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi. Lothar Rech from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.



Please let me know what you think.

Regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 12/14/2010 9:59:26 PM  
**Subject:** Re: Certificate for MY 2012 Test Group CVWXV02.5259

They are in the signing queue. I assume the other test group certs were signed since they are gone. Not sure why Linc didn't do those but I know some times its very slow to get through it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/14/2010 02:40 PM  
Subject: Certificate for MY 2012 Test Group CVWXV02.5259

Hello Jim,

I received a message on Friday that the certificate for MY 2012 Test Group CVWXV02.5259 was waiting to be signed.

Is there any reason it hasn't been signed yet?

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207  
E-mail: robert.hart@vw.com

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 12/14/2010 10:50:41 PM  
**Subject:** RE: FW: Conference Call - Audi

Len, I scheduled a room. Can you and Lothar connect and both call in to our phone? Or do we need a conference number?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/14/2010 01:47 PM  
Subject: RE: FW: Confernece Call - Audi

Hi Jim:

I just wrote back and tried to recall the message. I read your message too fast.

Next Monday at 10:00 sounds good. I will let Lothar know.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

From: Snyder.Jim@epamail.epa.gov [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, December 14, 2010 1:35 PM  
To: Kata, Leonard  
Subject: Re: FW: Confernece Call - Audi

Next Tuesday is mtg from 9 to 10 again so I guess monday morning. How about 10:00?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/14/2010 01:27 PM  
Subject: FW: Confernece Call - Audi

Hi Jim:

I received your message that the proposed time for tomorrow is not good. Unfortunately, Lothar is not in the office on Thursday or Friday, so my suggestion is to postpone until early next week. Would you propose a time, preferably no later than 11:00 a.m. on Monday (12/20) or Tuesday (12/21) that would work for you?

I will try to get some materials to you prior to the call. To be more specific about the topics:

1. General discussion concerning start-stop devices.
2. Shift speeds for manual transmission vehicles with start-stop devices.

Thanks,

Len

From: Kata, Leonard  
Sent: Friday, December 10, 2010 7:57 AM  
To: 'Snyder.Jim@epamail.epa.gov'  
Subject: Confernece Call - Audi

Hello Jim:

I am asking about scheduling a conference call with you and EPA staff to Discuss start-stop devices with Audi. Lothar Rech from Audi would join.

Wednesday, December 15, 2010 10:30 a.m. Detroit time. 30-45 minutes.

Please let me know what you think.

Regards,

Len

---

Leonard W. Kata

Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** "Rech, Lothar (I/EA-523)" [Lothar.Rech@AUDI.DE]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 12/15/2010 6:13:25 PM  
**Subject:** Re: EPA/AUDI Conference Call

I didn't get the earlier one but I received this, thanks.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rech, Lothar (I/EA-523)" <Lothar.Rech@AUDI.DE>  
Date: 12/15/2010 11:26 AM  
Subject: EPA/AUDI Conference Call

Hi Jim:

The e-gremlins must be active today. I sent an outlook invitation to you with a call-in number for our conference call on Monday (12/20) at 10:00. I keep getting an "undeliverable" message back, but the e-mail is in my sent items folder.

So... just in case, the following is the information for the call-in. Please use the Dial-In and the Participant Code below.

Audio Conference Information:

**Ex. 6**

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com



**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 12/15/2010 6:14:31 PM  
**Subject:** Re: VW Group: MY 2012 Test Waiver Requests

I now see six total. Is that all of them?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 12/15/2010 11:28 AM  
Subject: VW Group: MY 2012 Test Waiver Requests

Hello Jim,

I just submitted two more MY 2012 test waiver requests. I expect to submit two more by the end of the day if possible.

The first four were for two FEDV's (automatic and manual transmission versions) for test group CVWXV02.5U35 – federal only BIN 5 new midsized sedan (NMS ).  
This is a new model to be produced at VW's new factory in Tennessee.

The two from today and the two yet to be submitted are a PZEV version of the same vehicle.

These are all fuel economy tests for the first two test group applications that I have already submitted for certification.

Best regards,

Bob Hart

Robert Hart

Engineering and Environmental Office

Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326

Phone: (248) 754-4224  
Fax: (248) 754-4207



E-mail: robert.hart@vw.com

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 1/5/2011 8:41:28 PM  
**Subject:** cert fees

Hi Bob, I saw Vince. I was holding off on those Certs because you warned me the fees weren't recorded yet. I looked and they are in the system now so I'm reviewing the requests now.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Thomas, Richard" [Richard.Thomas@vw.com]; Hart, Robert (VWoA) [Robert.Hart@vw.com]; N=Willem VandenBroek/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 1/6/2011 3:45:14 PM  
**Subject:** Re: CVWXV02.03SA and CVWXV02.03PA

I reviewed the cert request yesterday. Once I get the word from Bill that we have received the funds, I will approve the two certificates.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Willem VandenBroek/AA/USEPA/US  
**To:** "Thomas, Richard" <Richard.Thomas@vw.com>  
**Cc:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 01/06/2011 09:30 AM  
**Subject:** CVWXV02.03SA and CVWXV02.03PA

Richard,

You should have received an automated email a few days ago saying that EPA had received payment for the Subject families at \$33,974 each. When we received the forms we charged them against the ACH payment for \$69,992 received from VW on 12/17/2010. (The forms for the remainder of that payment were filed from Germany). All that appears to be in order.

However, we noticed that the applications for these two families were filed in Calendar Year 2010. The fee is determined by the calendar year of the application (as stated at the top of the form), which, for applications received in calendar 2010, is \$34,849. Consequently, these two families have been designated as Short, On Hold, until the \$875 each has been received, upon which they will be listed as paid and cleared for certification review.

Let me know if you have any questions.

Bill Vanden Broek  
734-214-4468

**To:** "Hart, Robert (VWoA)" [Robert.Hart@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 1/13/2011 8:17:06 PM  
**Subject:** audi cert

Looks like there's 1 left. It's been going real slow this week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 2/17/2011 6:59:34 PM  
**Subject:** Re: Volkswagen Application for Emissions Certification - Test group CVWXV06.3UA8

Its there now.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Hart, Robert (VWoA)" <Robert.Hart@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 02/14/2011 04:16 PM  
Subject: Volkswagen Application for Emissions Certification - Test group CVWXV06.3UA8

Hello Jim,

Just a heads up that we have submitted the application for the above listed test group. This is a new test group. Confirmatory tests were waived and no manufacturer retests were required.

Please let me know if you have any questions about this submission.

Regards  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 3/8/2011 10:50:15 PM  
**Subject:** Re: VW Group Decision Information submissions for TG: CVWXV02.03PA  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Thanks, yes I saw the highway test flagged. Glad to read that you plan to test it. I was going to wait and see if you did it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance and Innovative Strategies Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 03/08/2011 02:57 PM  
Subject: VW Group Decision Information submissions for TG: CVWXV02.03PA

Hi Jim,  
We submitted today two Decision Information data sets for test group CVWXV02.03PA. These are related to a forthcoming Running Change to add the Jetta model to this existing Bin 3/ SULEV (PZEV) test group. No new technology is included with this model. The manual transmission configuration does require a HWY retest do to high fuel economy for the ETW.

Vehicle ID: VW361 00464 (Jetta manual trans)  
VW465 00127 (Jetta automatic trans)

Best regards,

Bill Rodgers  
Engineering and Environmental Office

VOLKSWAGEN Group of America, Inc.  
Rochester Hills, MI  
United States  
(248) 754-4219  
(248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

/ \_ \.  
(o\\_l\_/o)

**To:** "Beierschmitt, Thomas (T.A.)" [tbeiers1@ford.com]; ill Pagels [bill.pagels@meidenamerica.com]; ob Maxwell [remaxwell@comcast.net]; hris Nevers/AA/USEPA/US@EPA; Dave Kosmalski [david.kosmalski@gm.com]; ave Kosmalski [david.kosmalski@gm.com]; ennis Pawlak [Dennis.Pawlak@na.mitsubishi-motors.com]; ouglas Reid [Douglas.Reid@na.mitsubishi-motors.com]; Duoba, Mike" [mduoba@anl.gov]; eff Foor [jdf14@chrysler.com]; im Smith [james.smith@chrysler.com]; im Snyder/AA/USEPA/US@EPA; Keith Thompson [Keith.Thompson@bepco.com]; eith Thompson [Keith.Thompson@bepco.com]; ent Theil [okt@chrysler.com]; kyle.bedsale@gm.com" [kyle.bedsale@gm.com]; ahmoud Yassine [mky@chrysler.com]; arc Belzile [marc.a.belzile@tc.gc.ca]; ark paxton [mpaxton@ganassi.com]; 'MBrussow@sae.org" ['MBrussow@sae.org']; Meyer, Norm" [norm.meyer@tc.gc.ca]; Okawa, Naoyasu (N.)" [okawa.n@mazda.co.jp]; 'Paulina.Carl@epamail.epa.gov" ['Paulina.Carl@epamail.epa.gov']; Peabody, Jason (J.A.)" [jpeabod6@ford.com]; ete Janosi [petejanosi@yahoo.com]; Suanne.Thomas@vw.com" [Suanne.Thomas@vw.com]; takashi\_a\_fujiwara@ahm.honda.com" [takashi\_a\_fujiwara@ahm.honda.com]; iffany Jackson [JacksT2@nrd.nissan-usa.com]; homas Schrodtt/AA/USEPA/US@EPA;"tom.beierschmitt@tema.toyota.com" ['tom.beierschmitt@tema.toyota.com']; 'tom.beierschmitt@tema.toyota.com" ['tom.beierschmitt@tema.toyota.com']; 'tommy\_chang@ahm.honda.com" ['tommy\_chang@ahm.honda.com']; illiam Meschievitz [william.meschievitz@tema.toyota.com]

**From:** "Glodich, Jeffrey (J.M.)"

**Sent:** Fri 1/20/2012 6:35:58 PM

**Subject:** J2951 Phase II Review

Rescheduled due to conflicts.

**Purpose:**

- Discuss implementation and macro issues
- Revisit deferred issues that were not addressed in the initial publication

**Meeting Info:**

**Ex. 6**

Web Address <https://www.connectmeeting.att.com><<https://www.connectmeeting.att.com/>>

**Ex. 6**

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 4/20/2012 2:20:53 PM  
**Subject:** Re: Audi Start-Stop Demo

Hi Len, I looked through my file on previous S/S presentations and I don't see any technical info on how it works and the control conditons. We always ask for a list of inputs and parameters that enable / disable the S/S feature. Not just the parameter but the threshold constants ( such as coolant temp <40deg.). We want to make sure it is active under reasonable operating conditions. Also describe any special driving situations (like stop and go or panic stop) that will turn off the feature. Maybe you already presented some of this but I didn't find it in my notes.

I already reserved the lobby room so they can review how the feature works for say 20 minutes before we drive.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Kata, Leonard" <Leonard.Kata@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 04/20/2012 09:23 AM  
**Subject:** Audi Start-Stop Demo

Hello Jim:

Hope all is well with you.

I was speaking with my Audi colleagues on Wednesday and they asked about the Audi start-stop demo drive that we have scheduled with EPA for early May. They asked if EPA has any particular topics or questions that they should be prepared to address. My understanding was that EPA staff mainly wanted a chance to drive the car. I suggested that they have a 2-3 slide overview just as a refresher.

Just so we can be appropriately prepared, are you expecting any more detailed discussion?

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office



Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 4/26/2012 8:54:24 PM  
**Subject:** Re: VW Group - Request for AECD Approval  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Hi Bill, just wanted to let you know I've been looking at the AECDs but won't finish until next week.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Rodgers, William" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael" <michael.giles@vw.com>, "Kata, Leonard" <Leonard.Kata@vw.com>  
Date: 04/16/2012 01:59 PM  
Subject: VW Group - Request for AECD Approval

Hello Jim,  
I have submitted to Verify two 2013 AECD approval requests for the following test groups. Please contact Len Kata or myself if you have any questions about these requests.

DVWXV02.0U5N – TDI (non-SCR)  
DVWXV02.0U4S – TDI with SCR

Regards,

Bill Rodgers  
Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office  
3800 Hamlin Rd.  
Auburn Hills, MI 48436  
United States  
office (248) 754-4219  
fax (248) 754-4207  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 5/2/2012 8:02:28 PM  
**Subject:** RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

I don't see it in Verify.  
Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/02/2012 03:12 PM  
Subject: RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

One detail I forgot to mention – the RS5 has short timing for us, so any priority you can give would be highly appreciated.

Thanks,  
Mike

From: Giles, Michael  
Sent: Wednesday, May 02, 2012 3:03 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

Hello Jim,

Today we submitted the initial application and certificate request for Test Group DAD XV04.23UL, evaporative family DAD XR0140B8A which is for the Audi RS5 / RS5 Cabriolet.

This is a new test group with a new EDV and a carryover evaporative family.

Please proceed with your review and let me know if you have any questions.

Regards,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.

3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 5/2/2012 8:46:39 PM  
**Subject:** RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)

Yes, its there now.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 05/02/2012 04:27 PM  
Subject: RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

Hi Jim,

It should be there now – I submitted the request too soon after the application (VERIFY took longer to process the application so it rejected my first request).

Thanks

From: Jim Snyder [mailto:[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)]  
Sent: Wednesday, May 02, 2012 4:02 PM  
To: Giles, Michael  
Subject: RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

I don't see it in Verify.  
Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA

Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/02/2012 03:12 PM  
Subject: RE: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

One detail I forgot to mention – the RS5 has short timing for us, so any priority you can give would be highly appreciated.

Thanks,  
Mike

From: Giles, Michael  
Sent: Wednesday, May 02, 2012 3:03 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov)  
Cc: Rodgers, William  
Subject: VW Group Certificate Request - Test Group DAD XV04.23UL Audi RS5 / RS5 Cabriolet

Hello Jim,

Today we submitted the initial application and certificate request for Test Group DAD XV04.23UL, evaporative family DAD XR0140B8A which is for the Audi RS5 / RS5 Cabriolet.

This is a new test group with a new EDV and a carryover evaporative family.

Please proceed with your review and let me know if you have any questions.

Regards,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 5/2/2012 9:22:15 PM  
**Subject:** Re: Meeting with Audi - Start-Stop Device  
[leonard.kata@vw.com](mailto:leonard.kata@vw.com)

Thanks for the note. I have the lobby room reserved so we will have plenty of room if a lot of people show up. I look forward to their review and meeting Oliver Schimdt, I don't recall meeting him before.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: Chris Nevers/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, David A Wright/AA/USEPA/US@EPA, Joel Dalton/AA/USEPA/US@EPA, William Ott/AA/USEPA/US@EPA, "Schmidt, Oliver" <Oliver.Schmidt@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/01/2012 05:32 PM  
Subject: Meeting with Audi - Start-Stop Device

Hi Jim:

Just to keep you informed, Audi is coming to the May 8 meeting prepared to provide a review of the system and respond to the points that you mentioned to me (i.e., enable conditions, operation during reasonable drive conditions, panic stop, stop-and-go traffic, etc).

As you know, we have some Audi confirmatory testing going on at EPA so the Audi personal already there will attend the meeting and be able to respond to any questions. Participants from our side include:

- Karlheinz Kissling (Audi AG)
- Carsten Stang (Audi AG)
- Andy Kramer (Audi AG)
- Mark Banzer (Audi AG)
- Oliver Schmidt (VWGoA – General Manager EEO)
- Leonard Kata (VWGoA)
- William Rodgers (VWGoA) (tentative)

Mr. Schmidt is my current Manager and successor to Christoph Kohnen. He would appreciate the opportunity to meet EPA staff involved in emission certification and policy at this meeting.

Let me know if you have any further questions.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com



**To:** "Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 5/7/2012 8:22:06 PM  
**Subject:** audi testing

The Audi 3.0L is indeed ready for testing tomorrow, with S/Stop disabled. I couldn't find out when it will test so best recommendation is to show up at 7:00.  
The evap test result was .50g. Results should show up tomorrow in Verify.

The 4.0L is here and scheduled for wednesday.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/07/2012 12:48 PM  
Subject: VW Group - Cert Request for Audi Test Group DAD XV02.53UK (TTRS)

Hello Jim,

FYI, we just submitted a certification request for the above test group (Audi TTRS).

Note, this is a carryover test group with no new tests or models. Please let me know if you have any questions about this.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 5/7/2012 9:20:38 PM  
**Subject:** Re: Slides for EPA/Audi Meeting; May 8, 2012 - 1:00 p.m.

Thanks. See you tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA, David Good/AA/USEPA/US@EPA, Chris Nevers/AA/USEPA/US@EPA, David A Wright/AA/USEPA/US@EPA, Joel Ball/AA/USEPA/US@EPA, Joel Dalton/AA/USEPA/US@EPA, Linc Wehrly/AA/USEPA/US@EPA, Martin Reineman/AA/USEPA/US@EPA, Stephen Healy/AA/USEPA/US@EPA, William Ott/AA/USEPA/US@EPA  
Cc: "Schmidt, Oliver" <Oliver.Schmidt@vw.com>, "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/07/2012 05:02 PM  
Subject: Slides for EPA/Audi Meeting; May 8, 2012 - 1:00 p.m.

Hello all:

Prior to the May 8, 2012 demonstration of the Audi vehicle with cylinder deactivation and start-stop feature, we will provide a brief presentation.

I have attached a copy of the slides for your preview. The slides address the features of these systems and address questions previously raised by EPA such as:

- How the systems works (including control conditions)
- Parameters that enable the start-stop feature (including threshold constants)
- Assurance that the start-stop system is active under reasonable driving conditions
- A description of special driving situations that will turn off the system (e.g., stop-and-go traffic, panic stops, etc).

The presentation includes an animation which will be shown during our meeting but is not included here due the large file size.

We look forward to the meeting and demo drive.

Best regards,

Len

---

Leonard W. Kata  
Manager, Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com  
[attachment "Cylinder on Demand & Start-Stop\_EPA.PDF" deleted by Jim Snyder/AA/USEPA/US]

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 5/8/2012 7:12:58 PM  
**Subject:** Re: Audi Test Groups

Yes they are in there.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 05/08/2012 01:26 PM  
Subject: Audi Test Groups

Hello Jim,

I see that the cert is in for signature for the 4.2L RS5. Thanks for the fast turnaround on this (!)

Just to double check, can you confirm you have the following cert requests in your workflow (just to make sure our requests made it through).

- 1) DADXV05.2LR8 / evaporative family DADXR0130R8A submitted April 18
- 2) DADXV02.53UK / evaporative family DADXR0110238

Just as a heads up, there will be more coming by in the next days.

Thanks  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 5/14/2012 1:22:12 PM  
**Subject:** Re: FW: Release of Audi Test Vehicle D3UJ-DAQ  
[\[mailto:Mazaitis.Vincent@epamail.epa.gov\]](mailto:Mazaitis.Vincent@epamail.epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Mazaitis.Vincent@epamail.epa.gov>  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

Vince and I talked and I agreed that we can release the car.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 05/14/2012 08:10 AM  
Subject: FW: Release of Audi Test Vehicle D3UJ-DAQ

Hi Jim,

I think I should have sent the email below to you about releasing the Audi A8 – sorry about that. Please let us know status when you can.

Thanks,  
Mike

From: Giles, Michael (EEO)  
Sent: Friday, May 11, 2012 2:17 PM  
To: 'Vincent Mazaitis'  
Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com); Berenz, Sebastian (EEO)  
Subject: Release of Audi Test Vehicle D3UJ-DAQ

Hello Vince,

We are finished with the A8 4.0L (vehicle D3UJ-DAQ). Please let us know when it is released and we will arrange to have it picked up. I understand that we may be dropping off an in-use vehicle mid-week, we may decide to handle both tasks then.

Please advise.

Thanks,  
Mike

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, May 11, 2012 9:36 AM  
To: Giles, Michael (EEO)  
Cc: Jim Snyder  
Subject: RE: Audi test results

Hello Mike,

Here's the Verify results. Sorry the sheets are not complete (pages) but I think all the information you need is included. If you have any questions or concerns, please contact me.

Thanks,

Vince Mazaitis

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Date: 05/11/2012 08:31 AM  
Subject: RE: Audi test results

Vince,

Can you please send me the VERIFY test numbers? I think only Bill gets the email with this and he is out until Tuesday.

Thanks,

Mike

From: Vincent Mazaitis [mailto:Mazaitis.Vincent@epamail.epa.gov]  
Sent: Friday, May 11, 2012 7:23 AM  
To: Rodgers, William (EEO)  
Cc: Jim Snyder; Giles, Michael (EEO)  
Subject: Re: Audi test results

Hello Bill,

Please find enclosed the Laboratory Test Data for D3UJ-DAQ Config. 00 tested on 5-9-12. The official results are in Verify.

If you have any questions or concerns, please contact me.

Thanks Bill,

Vince Mazaitis

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Vincent Mazaitis/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
Date: 05/10/2012 02:21 PM  
Subject: Audi test results

Hello Vince,

When available, please scan and forward a copy of the test results conducted on Wed. May 9th for Audi test vehicle D3UJ-DAQ. Send to Mike Giles and myself.

Thanks

Bill Rodgers

Emissions Certification Engineer

VOLKSWAGEN Group of America, Inc.  
Engineering and Environmental Office

3800 Hamlin Rd.

Auburn Hills, MI 48436

United States

office (248) 754-4219

fax (248) 754-4207

[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

P Before you print it, think about your responsibility and commitment to the ENVIRONMENT!



**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 5/16/2012 7:57:47 PM  
**Subject:** Re: VW Group - Decision Information for 3.0L TDI

Why are they separate test groups if they are the same test vehicle? Is the SFTP composite marginal on the heavy one?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 05/16/2012 09:54 AM  
Subject: VW Group - Decision Information for 3.0L TDI

Hello Jim,

We just submitted 2 Decision Information requests for the following related vehicles:

Test Group	VehicleID	Configuration	Model
DADXT03.03UG	D3UG-TAQ	0	Audi Q7
DADXT03.02UG	D3UG-TAQ	1	Volkswagen Touareg

Note, both of these vehicles are the EDV for their test groups. While the test group and models are carryover, these vehicles represent a new generation for the engine with updated hardware and software. Please contact me if you have any questions.

Regards,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Rodgers, William" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 5/16/2012 9:04:57 PM  
**Subject:** Bentley Mulsanne

Bill, I was checking the CFR and a coworker pointed to a more recent section with regard to test vehicle selection. 86.1828-01 is more general in the criteria for worse case. Part e and f of 1828 along with 86.1839-01 (carryover) allow for criteria beyond test weight/RLHP/NV to determine worse case. Bentley needs to submit data explaining why they think the previous configuration is worse for emission than the new one. Emissions data or catalyst temperature comparisons are best but see what they have.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** CN=Jim Snyder/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 5/16/2012 9:13:57 PM  
**Subject:** Re: Bentley Mulsanne

Bill, was this primarily for EDV or was B hoping to carryover Fuel economy too? I can consider EDV carryover but I think it will be hard to not have a new configuration for FEDV.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: Jim Snyder/AA/USEPA/US  
To: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/16/2012 05:04 PM  
Subject: Bentley Mulsanne

Bill, I was checking the CFR and a coworker pointed to a more recent section with regard to test vehicle selection. 86.1828-01 is more general in the criteria for worse case. Part e and f of 1828 along with 86.1839-01 (carryover) allow for criteria beyond test weight/RLHP/NV to determine worse case. Bentley needs to submit data explaining why they think the previous configuration is worse for emission than the new one. Emissions data or catalyst temperature comparisons are best but see what they have.

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Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/17/2012 2:36:47 PM  
**Subject:** RE: Bentley Mulsanne  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

Good. That makes sense.

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Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 05/17/2012 07:37 AM  
**Subject:** RE: Bentley Mulsanne

Jim,  
I just spoke to Bentley. I think I was successful in persuading them to just present a complete set of new test data instead of burning up valuable hours trying to justifying the comparability of the two vehicles. Thanks for your help.  
Bill

**From:** Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Wednesday, May 16, 2012 5:14 PM  
**To:** Jim Snyder  
**Cc:** Rodgers, William (EEO)  
**Subject:** Re: Bentley Mulsanne

Bill, was this primarily for EDV or was B hoping to carryover Fuel economy too? I can consider EDV carryover but I think it will be hard to not have a new configuration for FEDV.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
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[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** Jim Snyder/AA/USEPA/US

To: "Rodgers, William" <William.Rodgers@vw.com>  
Date: 05/16/2012 05:04 PM  
Subject: Bentley Mulsanne

Bill, I was checking the CFR and a coworker pointed to a more recent section with regard to test vehicle selection. 86.1828-01 is more general in the criteria for worse case. Part e and f of 1828 along with 86.1839-01 (carryover) allow for criteria beyond test weight/RLHP/NV to determine worse case. Bentley needs to submit data explaining why they think the previous configuration is worse for emission than the new one. Emissions data or catalyst temperature comparisons are best but see what they have.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
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(734) 214-4946  
snyder.jim@epa.gov

**To:** "Kata, Leonard" [Leonard.Kata@vw.com]  
**Cc:** CN=Joel Ball/OU=AA/O=USEPA/C=US@EPA;CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Joel Dalton/OU=AA/O=USEPA/C=US@EPA;CN=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Linc Wehrly/OU=AA/O=USEPA/C=US@EPA;CN=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Stephen Healy/OU=AA/O=USEPA/C=US@EPA;CN=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=Chris Nevers/OU=AA/O=USEPA/C=US@EPA;CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;CN=William Ott/OU=AA/O=USEPA/C=US@EPA[]; N=William Ott/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 5/17/2012 9:14:41 PM  
**Subject:** VW and EPA Meeting - MPI/FSI Fuel Injection System

Len, Please add the above people to your mtg invitation in case they are interested.

This is a web mtg with Germany on their upcoming multipoint/direct injection fuel system on May 30 at 8am.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/5/2012 3:15:44 PM  
**Subject:** Re: VW Group Certification Requests for 3.0L V6 TDI

I already have other VW group cert requests that I working on through. Do you want me to jump to these two instead?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**Date:** 06/05/2012 11:11 AM  
**Subject:** VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,  
I have submitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups:  
All required manufacturer confirmatory tests have been completed.  
Anything you can do to get these processed this week would be appreciated. Let me know if there are nay questions.

DADXT03.02UG – VW Touareg TDI (LDT3)  
DADXT03.03UG – Audi Q7 TDI (LDT4)

Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/6/2012 7:51:51 PM  
**Subject:** Re: VW Group - Decision Information for Audi A6/A7 3.0L

When can I see the running change letter? Can you tell me what the changes are? Does it have higher FE?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/06/2012 02:52 PM  
Subject: VW Group - Decision Information for Audi A6/A7 3.0L

Hello Jim,

I have recently submitted decision information requests for 2 vehicles (A6 and A7) for Audi test group DADXJ03.03UF.

Some details:

- These vehicles are FEDV's and will support a running change letter which is on the way.
- The vehicles have stop/start as you should recall. We submitted tests under 4 configurations (see table below)
- Configuration 2 also has evaporative tests which support a new evaporative family. This new family with "B" suffix is similar to the existing "A" suffix but with a 5 gram bleed canister.
- The vehicles all had high FE and will require mfr. re-tests if they are not selected by EPA.

Vehicle ID: D3UF-CAQ

Conf.	Model	Stop-Start	Other
0	A6	Active	
1	A6	In-Active	
2	A6	Active	* Evap tests for cfg #2
3	A6	In-Active	

Please contact me if you have any questions about this.

Regards,  
Mike



Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
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FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/6/2012 8:22:12 PM  
**Subject:** RE: VW Group - Decision Information for Audi A6/A7 3.0L  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Thanks for the clarification.

Yes, I thought I had sent you a confirmation earlier regarding the cycles but I guess I hadn't sent it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 06/06/2012 04:17 PM  
**Subject:** RE: VW Group - Decision Information for Audi A6/A7 3.0L

I will try to get the letter to you by tomorrow morning.

The main difference is that the vehicles now have start/stop. Comparing to MY2012, there is also a new engine code, which likely reflects a software change. I will ask though and forward a more detailed answer.

Regarding fuel economy:

For the A6: Compared to MY 2012, MY 2013 was slightly worse for city, and 1 mpg better on highway.

For the A7: Compared to MY 2012, the MY2013 is slightly worse for both city and highway.

Also, per our recent agreement with Dave Good, we plan to average start / stop results only for the FTP and US06 tests. For the other tests (Hwy, SC03, Cold CO) we will use inactive configurations only for FE because Start-Stop mode has no effect.

Thanks  
Mike

**From:** Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Wednesday, June 06, 2012 3:52 PM  
**To:** Giles, Michael (EEO)

Subject: Re: VW Group - Decision Information for Audi A6/A7 3.0L

When can I see the running change letter? Can you tell me what the changes are? Does it have higher FE?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/06/2012 02:52 PM  
Subject: VW Group - Decision Information for Audi A6/A7 3.0L

Hello Jim,

I have recently submitted decision information requests for 2 vehicles (A6 and A7) for Audi test group DADXJ03.03UF.

Some details:

- These vehicles are FEDV's and will support a running change letter which is on the way.
- The vehicles have stop/start as you should recall. We submitted tests under 4 configurations (see table below)
- Configuration 2 also has aevaporative tests which support a new evaporative family. This new family with "B" suffix is similar to the existing "A" suffix but with a 5 gram bleed canister.
- The vehicles all had high FE and will require mfr. re-tests if they are not selected by EPA.

Vehicle ID: D3UF-CAQ

Conf.	Model	Stop-Start	Other
0	A6	Active	
1	A6	In-Active	
2	A6	Active	* Evap tests for cfg #2
3	A6	In-Active	

Please contact me if you have any questions about this.

Regards,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.

3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 6/11/2012 3:01:14 PM  
**Subject:** RE: VW Group Certification Requests for 3.0L V6 TDI

So far it's looking like a fairly quiet week and there are none in front of them so this week looks likely unless I find some problems.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/11/2012 10:19 AM  
Subject: RE: VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,

As a follow up, could you advise on the status of the two 3.0L diesel certificates below?

We are being told this is urgent, so any assistance you can provide would be appreciated.

Thanks,  
Mike

From: Rodgers, William (EEO)  
Sent: Tuesday, June 05, 2012 11:11 AM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael (EEO)  
Subject: VW Group Certification Requests for 3.0L V6 TDI

Hello Jim,  
I have submitted Applications and Certification Requests for the following 3.0L V6 TDI Test Groups:  
All required manufacturer confirmatory tests have been completed.  
Anything you can do to get these processed this week would be appreciated. Let me know if there are any questions.

DADXT03.02UG – VW Touareg TDI (LDT3)  
DADXT03.03UG – Audi Q7 TDI (LDT4)

Regards,  
Bill Rodgers

VWGoA EEO  
(248) 754-4219

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/13/2012 9:34:54 PM  
**Subject:** Re: VW Group - Request for Certificate DVWXV02.0U5N

As of 5:30, The only new request today was DAD XV02.03UB .

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/13/2012 03:41 PM  
Subject: VW Group - Request for Certificate DVWXV02.0U5N

Hello Jim,

Today we submitted the application and request for certificate for Volkswagen carryover test group DVWXV02.0U5N. This test group is the one featuring the 2.0L TDI without SCR (Jetta, Audi A3, SportWagen).

This test group is carryover but includes two new models introduced as FEDV's (Beetle, Beetle Convertible).

We would like to request that this be high priority for VW group due to sales volume and timing. Please let me know if you have any questions.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 6/15/2012 7:21:04 PM  
**Subject:** Re: Verify Question

If the new data was waived and the Part 1 was revised with the new CSI emission data then I think you are done since the certificate is unchanged.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**Date:** 06/15/2012 02:14 PM  
**Subject:** Verify Question

Jim,  
I revised the Initial Application for the test group DVWXJ02.03UA to reflect new tests we submitted representing new calibration for Start of Production on the worst case vehicle (Tiguan 4Motion automatic). My question is, do we need a revised Certificate if we already have one based on carryover data from 2012 model year? the Carline already exists on the Certificate and the tests were all waived.

Thanks  
Bill Rodgers  
Emissions Certification Specialist

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Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
william.rodgers@vw.com



**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/19/2012 8:32:41 PM  
**Subject:** Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/19/2012 03:45 PM  
Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

I just submitted a decision request for the new 1.4L Jetta Hybrid (1.4L), for test group DVXXV01.4PHE.

This vehicle has new technology all around (engine, evaporative family, OBD system, ORVR system). Our understanding is that EPA will most likely want to do confirmatory tests.

Please let me know if you have any questions processing this request.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/19/2012 8:46:08 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Are you positive? The cert preview document lists this vehicle and test group as a 1.4L TFSI with plug-in hybrid technology. Did they change it since October?

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(734) 214-4946  
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From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 06/19/2012 04:38 PM  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

No plug in, I believe it is a standard "HEV" because there is no outside power source other than the fuel.

The available date is September 17th.

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:33 PM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO)  
Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

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**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 6/19/2012 9:29:27 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Is there another EDV car coming? Its a new evap group and I don't see any evap tests submitted.

Jim Snyder  
Light-Duty Vehicle Group  
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United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

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**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/20/2012 12:24:21 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[mailto:Snyder.Jim@epamail.epa.gov](mailto:mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

On page 2 and page 6 it mentions a 1.4L TFSI plug-in hybrid Jetta. It doesn't specify the test group # on those pages but I see no other on the chart.

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To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/20/2012 08:14 AM  
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Mike

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To: Giles, Michael (EEO)  
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Sent: Tuesday, June 19, 2012 4:33 PM  
To: Giles, Michael (EEO)  
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**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/20/2012 12:32:54 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
<mailto:Snyder.Jim@epamail.epa.gov>  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Okay, I suspected it was something like that but wanted to find out if they were more than one version coming.

What about the evaporative tests? I don't see any. Is there another EDV coming?

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Light-Duty Vehicle Group  
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United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** "Giles, Michael (EEO)" <michael.giles@vw.com>, Jim Snyder/AA/USEPA/US@EPA  
**Date:** 06/20/2012 08:27 AM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid

Sorry for the confusion guys. The Certification Preview cover letter (I created) did describe it as a plug-in hybrid as originally planned, however those plans have been delayed. The 2013 model year vehicle is not a plug in.

Bill Rodgers  
Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
[william.rodgers@vw.com](mailto:william.rodgers@vw.com)

**From:** Giles, Michael (EEO)  
**Sent:** Wednesday, June 20, 2012 8:07 AM  
**To:** Jim Snyder

Cc: Rodgers, William (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

I just checked our copy of the MY 2013 pre-certification document, and did not see any mention of plug in (looking at the table of page 10 ). The vehicle is clearly described a standard HEV in our data set we received.

If you do have a plug in described, can you tell me where so we can resolve or correct if necessary?

Thanks  
Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:46 PM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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Date: 06/19/2012 04:38 PM  
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From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Tuesday, June 19, 2012 4:33 PM  
To: Giles, Michael (EEO)  
Cc: Rodgers, William (EEO)  
Subject: Re: VW Group - Decision Info 1.4L Jetta Hybrid

Is this a plug-in hybrid? When will it be available for testing?

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Light-Duty Vehicle Group

Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

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To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/19/2012 03:45 PM  
Subject: VW Group - Decision Info 1.4L Jetta Hybrid

Hello Jim,

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Please let me know if you have any questions processing this request.

Thanks,  
Mike

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3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** CN=Joel Dalton/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rodgers, William" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 6/21/2012 9:49:28 PM  
**Subject:** VW certificate

Joel, VW is re-submitting a certificate after having to change a test number so Verify can do the Litmus test. It hasn't shown up yet so go ahead and approve if it appears friday while i'm out. You can talk to Bill if any questions about it., if it appears.

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**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 6/27/2012 4:06:33 PM  
**Subject:** Re: Beetle Test on Hold

I spoke to Ben Haynes in the lab and he has put it on hold.

Jim Snyder  
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snyder.jim@epa.gov

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To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 06/27/2012 09:46 AM  
Subject: Beetle Test on Hold

Hi Jim,

As we discussed, we will need to reschedule the Beetle test originally set for July 11th. Please cancel this test and we will submit a new ready date in the next day or two, to re-schedule.

Thanks,  
Mike

Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
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United States of America  
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**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 7/2/2012 7:22:23 PM  
**Subject:** RE: VW Group - Decision Info 1.4L Jetta Hybrid  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
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[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

Mike, I haven't heard anything on the scheduling. There are a lot of people on vacation last week and this week. I don't think Ben was in today but I can look into it tomorrow,

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To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 07/02/2012 02:13 PM  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

Hope you had a good weekend.

This is just a follow up on the hybrid test date we need. Please let me know the status when you can.

Thanks,  
Mike

From: Giles, Michael (EEO)  
Sent: Monday, June 25, 2012 3:20 PM  
To: 'Jim Snyder'  
Cc: Rodgers, William  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

Just to follow up, I finally managed to get the supplemental information accepted today for the Jetta Hybrid confirmatory test.

Please advise of the test date at your earliest convenience.

Thanks,  
Mike

From: Giles, Michael (EEO)  
Sent: Wednesday, June 20, 2012 9:33 AM  
To: 'Jim Snyder'  
Cc: Rodgers, William  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Hi Jim,

The decision information for the Jetta Hybrid has been corrected to include the evaporative tests, as well as 3 additional supporting FTP tests.

Sorry about the omission, I was under the idea that the d.i. was relevant only for exhaust tests.

Regards,  
Mike

From: Giles, Michael (EEO)  
Sent: Wednesday, June 20, 2012 8:56 AM  
To: 'Jim Snyder'  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

Jim,

I will input the evaporative tests soon, sorry about the omission.

Regards  
Mike

From: Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
Sent: Wednesday, June 20, 2012 8:24 AM  
To: Giles, Michael (EEO)  
Subject: RE: VW Group - Decision Info 1.4L Jetta Hybrid

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To: Giles, Michael (EEO)



Cc: Rodgers, William (EEO)  
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**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/2/2012 9:56:36 PM  
**Subject:** Re: Confirmatory Tests for D3UJ-DAD/0

Yes, they are there now. Good job.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 08/02/2012 08:18 AM  
**Subject:** Confirmatory Tests for D3UJ-DAD/0

Hi Jim,  
Thanks for the phone message regarding your decision to waive testing for VID: D3UJ-DAD/0, Test group DADX04.03UJ.  
As an experiment to solve the issue of missing confirmatory tests in Verify, I was successful in updating the Decision Information file again to now include the following EPA confirmatory tests in the set. Check your system and let me know if you now see all tests.

DADX91001362 - 90  
DADX91001363 - 90  
DADX91001370 - 21  
DADX91001371 - 3

Regards,  
Bill Rodgers  
Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
william.rodgers@vw.com

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 8/2/2012 10:27:51 PM  
**Subject:** Re: VW Group - Certificate Request for 2013 Audi Q5 Hybrid

Bill, Was looking at the projected sales in the Part 1. Are these numbers correct? What were the volumes from 2012MY?

2013 MY

Projected Sales by Carline, Test Weight and Transmission Configuration

## Ex. 4 - CBI

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** Stephen Healy/AA/USEPA/US@EPA, "Giles, Michael (EEO)" <michael.giles@vw.com>  
**Date:** 07/26/2012 10:58 AM  
**Subject:** VW Group - Certificate Request for 2013 Audi Q5 Hybrid

Hello Jim,  
We have submitted a Certificate Request for Audi test group DADXT02.0HUB, Audi Q5 Hybrid. The Initial Application and required manufacturer confirmatory tests have been submitted to Verify. Please review and process a Certificate of Conformity by August 3rd if possible. You can contact me directly if there are any questions about these submissions.

Best regards,

Bill Rodgers  
Emissions Certification Specialist

VOLKSWAGEN GROUP OF AMERICA, INC.  
Engineering and Environmental Office  
Auburn Hills, MI  
(248) 754-4219  
william.rodgers@vw.com



**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/10/2012 9:25:10 PM  
**Subject:** Re: EPA Confirmatory Test CO2 Bag Data

Yes that is true. I also checked some recent tests and saw the bag data there.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**Date:** 08/10/2012 11:02 AM  
**Subject:** EPA Confirmatory Test CO2 Bag Data

Hello Jim,  
Can you confirm if CO2 bag data will now be included in the Verify generated XML test reports for confirmatory tests conducted at EPA. It's currently required by manufacturers to input this data in Verify for Manufacturer performed tests but last EPA test reports we pulled from May did not include the CO2 bag data. We need the data to calculating 5-cycle fuel economy labels when confirmatory tests apply.

Thanks,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/10/2012 10:14:56 PM  
**Subject:** Bentley cert

Bill, the filing fee appeared today for the Bentley but I haven't looked at it much yet. Any rush or can it wait to later next week?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 8/21/2012 3:38:55 PM  
**Subject:** Re: FW: Confirmatory Test Waived (BY77623/13 / 1)

I didn't realize there was a fourth config. It rolled off the page onto page 2.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Date: 08/21/2012 11:30 AM  
Subject: FW: Confirmatory Test Waived (BY77623/13 / 1)

Hello Jim,

We waivers for 3 of the 4 configurations here (thank you)! Can you confirm status for configuration #3?

Thanks,  
Mike

-----Original Message-----

From: no-reply@epa.gov [mailto:no-reply@epa.gov]  
Sent: Tuesday, August 21, 2012 11:12 AM  
To: Rodgers, William (EEO); Giles, Michael (EEO); Hart, Robert (VWoA); Thomas, Richard (EEO); VWoA EEO Government  
Subject: Confirmatory Test Waived (BY77623/13 / 1)

The following is a courtesy copy of status message for a Verify submission. Any references made to links refer to links which will appear in the CDX Inbox message.

Confirmatory Test for the following Vehicle has been Waived:

Manufacturer: BEX  
Vehicle ID: BY77623/13  
Vehicle Configuration: 1

The Verify submission this message relates to has the following values:

Vehicle ID: BY77623/13

Vehicle Configuration #: 1

Test Group Name: DBEXV06.04UC

The following transaction identifier has been assigned to this request:

\_4f93cd18-f551-4a99-8e45-ed343d011a56

Please do not reply to this message.



**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** "Giles, Michael" [michael.giles@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Fri 8/24/2012 2:59:46 PM  
**Subject:** RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Bill, I talked to Mike about this but here's the story. Even though it is a Conditional Cert, I don't think I can include the Q5 on the certificate until you have at least submitted data on the Q5 since it will be the new EDV. The Conditional provision is only intended for vehicles pending a confirmatory test. I will deny the cert request and you can re-submit it without the Q5.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>  
Date: 08/23/2012 09:50 AM  
Subject: RE: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hi Jim,  
I should clarify that I have described Audi Q5 in this Application but have not yet submitted E85 test data for the model. We anticipate data in the coming weeks, at which time you had mentioned possibly selecting it for EVAP confirmatory testing to coincide with the already selected A5 Cabrio EVAP confirmatory tests from this test group.  
Considering that the certificate would be conditional with or without Q5 included, I propose the Certificate be issued as requested (with Q5) to allow vehicles to be Labeled and shipped immediately IF we receive a test waiver from you for the E85 exhaust tests.

Sorry for the confusion.  
Bill

From: Rodgers, William (EEO)  
Sent: Wednesday, August 22, 2012 3:44 PM  
To: 'Jim Snyder' (Snyder.Jim@epamail.epa.gov)  
Cc: Giles, Michael; Thomas, Richard (EEO); Kata, Leonard (EEO)  
Subject: VW Group - 2013 FFV Test Group Certification Request - DADXJ02.0FUB

Hello Jim,  
I have submitted the Initial Application and confirmatory test Decision Information for the following 2013 Audi flex-fuel Test Group/Evaporative Family. All tests have been submitted including manufacturer confirmatory tests. This test group was recently selected for EPA confirmatory EVAP testing.

As previously discussed, this flex-fuel test group uses carry across gasoline test data from the test group DADXV02.03UB which has been verified to have identical engine and transmission programming for gasoline operation.

We are requesting a conditional certificate be issue as soon as possible due to a very tight port release deadline as early as August 31st.

Test Group: DADXJ02.0FUB  
Evap. Family: DADXR0140B8F

Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; N=Ben Haynes/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/11/2012 9:52:09 PM  
**Subject:** Re: VW Group - EVAP Test Schedule

Ben, have you seen the test request for vehicle DFUB-BAQ on your side?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>  
Date: 09/11/2012 09:27 AM  
Subject: VW Group - EVAP Test Schedule

Hello Jim,  
We would like to request that the Audi A5 Cabriolet, VID: DFUB-BAQ, selected for Evap testing be scheduled for delivery to EPA on October 29 with testing on October 31.

I am also getting ready to submit new test data for an Audi A8 with 3.0l TDI diesel and stop-start. This will be requested for the week prior (Oct 22nd.) if selected for testing.  
Let me know if this A5 schedule works for you.

Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Tue 9/11/2012 11:44:41 PM  
**Subject:** Re: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Bill, I was looking over the running change Certificate request on Test Group DADXJ02.0FUB and noticed it wasn't a conditional. Since its a running change on a conditional certificate I think it has to be a conditional too.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Giles, Michael (EEO)" <michael.giles@vw.com>  
Date: 09/05/2012 10:47 AM  
Subject: VW Group - Confirmatory test decision information for VID DFUB-Q5A

Hello Jim,  
Just a heads up that we submitted E85 exhaust tests and Decision Information for the VID: DFUB-Q5A (Audi Q5 2.0L FFV). A running change to add this vehicle as the new EDV for this test group is forthcoming. Please let us know as soon as possible if you intent to confirm these tests.

PS - We will be submitting additional Audi Q5 3.0L stop-start test data, including Evap. tests, for another test group in the next day. You had expressed interest in confirming the Evap. tests and scheduling it with the recently selected Evap. tests for VID: DFUB-BAQ (Audi A5 Cabriolet).

Regards,  
Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** "Rodgers, William (EEO)" [William.Rodgers@vw.com]; Giles, Michael" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 9/12/2012 12:37:04 PM  
**Subject:** Re: VW Group - EVAP Test Schedule

Bill, Ben said he hasn't seen the test request for this vehicle. 10/31 sounds okay as a test date but you have to submit all the supplemental info along with the test date before Ben will see and schedule it.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** Jim Snyder/AA/USEPA/US  
**To:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>, Ben Haynes/AA/USEPA/US@EPA  
**Date:** 09/11/2012 05:52 PM  
**Subject:** Re: VW Group - EVAP Test Schedule

Ben, have you seen the test request for vehicle DFUB-BAQ on your side?

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Cc:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**Date:** 09/11/2012 09:27 AM  
**Subject:** VW Group - EVAP Test Schedule

Hello Jim,  
We would like to request that the Audi A5 Cabriolet, VID: DFUB-BAQ, selected for Evap testing be scheduled for delivery to EPA on October 29 with testing on October 31.

I am also getting ready to submit new test data for an Audi A8 with 3.0l TDI diesel and stop-start. This will be requested for the week prior (Oct 22nd.) if selected for testing.

Let me know if this A5 schedule works for you.

Bill Rodgers  
VWGoA EEO  
(248) 754-4219

**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 9/12/2012 3:37:48 PM  
**Subject:** Re: Audi Meeting with EPA - Proposal

Hi Len , I got your note yesterday. I'm just thinking about who to invite since you mentioned Tier 3. We usually try to limit mtgs to 2 hours. I rather push them into condensing their discussion down to that.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rech, Lothar (I/EA-523)" <Lothar.Rech@AUDI.DE>, "Rist, Domenic (I/EA-523)" <Domenic.Rist@audi.de>, "Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>  
Date: 09/11/2012 04:27 PM  
Subject: Audi Meeting with EPA - Proposal

Hello Jim:

I wrote to you earlier today to request a meeting with some VWAG colleagues toward the end of next week. I hope that we can work that out. I am writing again to ask for an additional meeting at the end of October. In this case it would be with our colleagues from Audi AG

We propose a meeting at one of the following times:

- Monday, October 29 2012; afternoon
- Tuesday, October 30, 2012; morning

We would appreciate a three-hour time slot. Proposed discussion topics include:

- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com



**To:** "Kata, Leonard (EEO)" [Leonard.Kata@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Wed 9/12/2012 8:31:25 PM  
**Subject:** RE: Audi Meeting with EPA - Proposal

Len, I confirmed with Linc that we (our division) don't want to discuss Tier 3 topics. You need to take that up with the rulemaking guys in the ASD division. Mike Olechiw is the guy to call at 214-4297. Can you elaborate on the FFV usage and Label Calculation? I may need to bring Rob French and Bob Peavyhouse in depending on what they want to talk about,.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**From:** "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 09/12/2012 01:05 PM  
**Subject:** RE: Audi Meeting with EPA - Proposal

Hello Jim:

I will let my Audi colleagues know about the time limit. Otherwise I will wait to hear which date works best for you.

Thanks,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**From:** Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Wednesday, September 12, 2012 11:38 AM  
**To:** Kata, Leonard (EEO)

Subject: Re: Audi Meeting with EPA - Proposal

Hi Len , I got your note yesterday. I'm just thinking about who to invite since you mentioned Tier 3. We usually try to limit mtgs to 2 hours. I rather push them into condensing their discussion down to that.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Kata, Leonard (EEO)" <Leonard.Kata@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rech, Lothar (I/EA-523)" <Lothar.Rech@AUDI.DE>, "Rist, Domenic (I/EA-523)" <Domenic.Rist@audi.de>, "Schmidt, Oliver (EEO)" <Oliver.Schmidt@vw.com>  
Date: 09/11/2012 04:27 PM  
Subject: Audi Meeting with EPA - Proposal

Hello Jim:

I wrote to you earlier today to request a meeting with some VWAG colleagues toward the end of next week. I hope that we can work that out. I am writing again to ask for an additional meeting at the end of October. In this case it would be with our colleagues from Audi AG

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- Field Survey for Idle Start Stop
- Idle Start / Stop – 2nd Generation
- Idle Start / Stop with Default on vs. Last Mode
- Drive Select Mode
- Tier 3 Credit Calculation
- SFTP II for Interim Tier 3
- FFV usage factor for MY 2017 (x % Ethanol = E85 driving)
- Label Calculation

Please let me know if you, and other EPA staff that you think should be involved, are available.

Best regards,

Len

---

Leonard W. Kata  
Senior Manager  
Emission Regulations and Certification  
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Volkswagen Group of America, Inc.  
Phone: (248) 754-4204  
Cell: (248) 797-3886  
E-Mail: leonard.kata@vw.com

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/13/2012 12:43:14 PM  
**Subject:** Re: VW Group - Bentley Application Submitted DBEXV06.04UC

Hasn't shown up yet.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 09/13/2012 08:29 AM  
Subject: VW Group - Bentley Application Submitted DBEXV06.04UC

Hello Jim,

I have submitted the application for new Bentley test group DBEXV06.04UC, which is for the continental GT/GTC carlines. This new test group is a carry-over (across) from currently certified test group DBEXV06.0501, which has the same evaporative family.

The changes for this new test group consist of an 8 speed transmission and a new engine controller.

Note – I have submitted both the applications and the certificate request, but have not received confirmation from VERIFY – please advise if you do not have either of these soon. As we discussed yesterday, timing is tight for us on this so as always we would appreciate your quick response.

Regards  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** []  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/13/2012 11:15:37 PM  
**Subject:** RE: VW Group - Bentley Application Submitted DBEXV06.04UC  
[\[mailto:Snyder.Jim@epamail.epa.gov\]](mailto:Snyder.Jim@epamail.epa.gov)  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)  
[michael.giles@vw.com](mailto:michael.giles@vw.com)  
[William.Rodgers@vw.com](mailto:William.Rodgers@vw.com)

The cert request is in verify. I glanced at it and found that the fee payment hasn't shown up yet. Shows VW sent it 8/31.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

**From:** "Giles, Michael (EEO)" <michael.giles@vw.com>  
**To:** Jim Snyder/AA/USEPA/US@EPA  
**Date:** 09/13/2012 10:36 AM  
**Subject:** RE: VW Group - Bentley Application Submitted DBEXV06.04UC

I now have a report that the certificate request was accepted.

**From:** Giles, Michael (EEO)  
**Sent:** Thursday, September 13, 2012 9:15 AM  
**To:** 'Jim Snyder'  
**Subject:** RE: VW Group - Bentley Application Submitted DBEXV06.04UC

Hi Jim,

I see that the pdf's were finally accepted. I am hoping that the cert request report comes back soon.

**From:** Jim Snyder [mailto:Snyder.Jim@epamail.epa.gov]  
**Sent:** Thursday, September 13, 2012 8:43 AM  
**To:** Giles, Michael (EEO)  
**Subject:** Re: VW Group - Bentley Application Submitted DBEXV06.04UC

Hasn't shown up yet.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946

snyder.jim@epa.gov

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: Jim Snyder/AA/USEPA/US@EPA  
Cc: "Rodgers, William (EEO)" <William.Rodgers@vw.com>  
Date: 09/13/2012 08:29 AM  
Subject: VW Group - Bentley Application Submitted DBEXV06.04UC

Hello Jim,

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The changes for this new test group consist of an 8 speed transmission and a new engine controller.

Note – I have submitted both the applications and the certificate request, but have not received confirmation from VERIFY – please advise if you do not have either of these soon. As we discussed yesterday, timing is tight for us on this so as always we would appreciate your quick response.

Regards  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207

**To:** Wright.DavidA@epamail.epa.gov;Dalton.Joel@epamail.epa.gov;Leonard.Kata@vw.com[]; alton.Joel@epamail.epa.gov;Leonard.Kata@vw.com[]; eonard.Kata@vw.com[]  
**Cc:** []  
**Bcc:** []  
**From:** Snyder.Jim@epamail.epa.gov  
**Sent:** Mon 9/17/2012 2:57:34 PM  
**Subject:** Volkswagen Meeting w/EPA -evap emission testing for future advanced technology vehicles

Len there is a slight chance that I won't be back by thursday for this mtg but I will be in Friday. In case there is a change, Dave's number is 214-4467 and Len's number is 248-754-4204.


Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]  
**Cc:** CN=DavidA Wright/OU=AA/O=USEPA/C=US@EPA;"Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Thur 9/27/2012 4:56:00 PM  
**Subject:** Jetta hybrid results  
[2013 jetta hybrid results.pdf](#)

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
snyder.jim@epa.gov



0812T

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0257-012			Vehicle ID: 361 730 136/13				
<div style="display: flex; justify-content: space-between;"> <div style="width: 15%;">  </div> <div style="width: 65%;"> <b>Test Information</b>            Test Date: 9/26/2012            Key Start / Hot Soak: 08:03:39 / 09:53            Fuel Container ID: F00023            Fuel Type: 61 Tier 2 Cert Test Fuel            Test Procedure: 21.04 Fed Fuel 2-day Exhaust (CAN LOAD)            Calculation Method: Gasoline            Pretest Remarks:         </div> <div style="width: 20%;">           MFR Name: VOLKSWAGEN            MFR Codes: 590 VWX            Config #: 00            Transmission: AUTO            Shift Schedule: A09980005            Beginning Odometer: 009468.0 KM            Drive Schedule: ftp4bag            Soak Period: 20.2 hours         </div> </div>							
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	6.005	19.678	0.805	0.809	2.445		
Ambient	3.025	0.381	0.017	0.047	2.128		
Net Concentration	3.164	19.320	0.789	0.765	0.445	2.675	
Remarks:							
<b>Phase 2</b>							
Sample	3.067	1.963	0.008	0.298	2.124		
Ambient	2.911	0.398	0.017	0.046	2.104		
Net Concentration	0.221	1.574	-0.009	0.253	0.067	0.147	
Remarks:							
<b>Phase 3</b>							
Sample	3.352	11.617	0.184	0.713	2.296		
Ambient	2.887	0.521	0.016	0.045	2.103		
Net Concentration	0.619	11.124	0.169	0.670	0.304	0.285	
Remarks:							
<b>Phase 4</b>							
Sample	2.981	1.525	0.015	0.279	2.126		
Ambient	2.872	0.564	0.008	0.045	2.109		
Net Concentration	0.169	0.973	0.007	0.234	0.060	0.103	
Remarks:							
<b>Results</b>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.030	0.366	0.022	227.8	0.005	0.025 / 0.026	39.169
Phase 2	0.003	0.047	0.000	119.8	0.001	0.002 / 0.002	74.610
Phase 3	0.006	0.210	0.005	198.6	0.003	0.003 / 0.003	44.978
Phase 4	0.003	0.029	0.000	110.4	0.001	0.002 / 0.002	80.995
Weighted	0.00921	0.15246	0.00603	160.978	0.00247	0.0069 / 0.0071	
(NMOG=1.04xNMHC)							
<b>Fuel Economy</b>	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					
Phase 1	39.08	Dyno #: D002					
Phase 2	74.44	Inertia: 3625					
Phase 3	44.88	EPA Set Co A: 7.3499999					
Phase 4	80.81	EPA Set Co B: 0.0141					
		EPA Set Co C: 0.01545					
Weighted	55.36	<u>1% SOC Limit</u>	<u>Act SOC A-hr</u>	<u>Sys Nom Volts</u>	<u>Charge State</u>	<u>Emiss-Bench: D002</u>	
		0.4107	0.022	220.0	Pass		

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0257-012

Vehicle ID: 361 730 136/13

### Results



	<u>HC-FID</u> (grams)	<u>CO</u> (grams)	<u>NOx</u> (grams)	<u>CO2</u> (grams)	<u>CH4</u> (grams)	<u>NMHC</u> (grams)	<u>Meth Response</u>
Phase 1	0.106	1.311	0.080	815.6	0.017	0.090	1.098
Phase 2	0.013	0.183	0.000	462.7	0.004	0.008	
Phase 3	0.021	0.754	0.017	713.5	0.012	0.010	
Phase 4	0.010	0.113	0.001	427.9	0.004	0.006	

### Test Conditions

	<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>
Barometer (inHg)	28.96	28.96	28.96	28.96
Avg Cell Temp (degF)	75.17	75.15	75.23	75.11
Dew Point (degF)	49.43	49.34	49.43	49.43
Specific Humidity (grains/lbm)	54.17	53.98	54.17	54.17
NOx Corr Factor	0.9108	0.9101	0.9108	0.9108
CO2 Dilution Factor	16.515	44.909	18.746	48.01
CFV Vmix (scf @68F)	2057.95	3524.63	2054.63	3523.71
CVS Flow Rate Avg (scfm)	242.97	240.29	242.86	242.99
Fan Placement: One Fan - Up - Front				
Phase Time (secs)	508.21	870.10	507.60	870.10
Distance (miles)	3.581	3.861	3.593	3.875
Bag Analysis Time (secs)	74.9	87.7	74.5	75.6

### MFR Test Results

for Procedure 21 Federal fuel 2-day exhaust (w/can load)

<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>
1E+07	0.007	0.178	0.0061	155	0	0.0046

Odometer  
9082 K

MPG  
57.2


MPG is 3.33 % higher than EPA MPG

MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

QERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0257-011		Vehicle ID: 361 730 136/13					
 <b>Test Information</b>	Test Date: 9/26/2012	MFR Name VOLKSWAGEN					
	Key Start: 09:50:26	MFR Codes: 590 VWX					
	Fuel Container ID: F00023	Config #: 00					
	Fuel Type: 61 Tier 2 Cert Test Fuel	Transmission: AUTO					
	Test Procedure: 03 HWFET (hwfetprep_hwfet)	Shift Schedule: A09980011					
	Calculation Method: Gasoline	Beginning Odometer: 009492.0 KM					
Pretest Remarks: ODO in kilometers		Drive Schedule: hwfet_hwfet					
<hr/>							
<b>Bag Data</b>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
<b>Phase 1</b>	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
Sample	3.097	12.737	0.034	0.926	2.017		
Ambient	3.071	1.194	0.024	0.047	2.121		
Net Concentration	0.238	11.626	0.012	0.882	0.042	0.191	
Remarks:							
<b>Phase 2</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.001	0.115	0.000	136.8	0.000	0.001 / 0.001	65.327
(NMOG=1.04xNMHC)							
<b>Fuel Economy</b>	<u>Gasoline MPG</u>	<u>Coastdown secs:</u>	23.66	<u>Dyno Settings</u>	Dyno #: D002		
Phase 1	65.18		23.68		Inertia: 3625		
			23.73		EPA Set Co A: 7.3499999		
					EPA Set Co B: 0.0141		
					EPA Set Co C: 0.01545		
	<u>1% SOC Limit</u>	<u>Act SOC A-hr</u>	Sys Nom Volts:	<u>Charge State</u>			
	0.2408	0.1246	220.0	Pass			
			23.69		Emiss-Bench: D002		
v120518 - d002 EPAVDAEm120926092129 Page 1 of 2 Print Time 26-Sep-2012 15:27							

# NVFEL Laboratory Test Data

CVS

## Final Laboratory Test Results- Refer to VERIFY Reports for Official Data

Test Number: 2012-0257-011

Vehicle ID: 361 730 136/13

Results	HC-FID	CO	NOx	CO2	CH4	NMHC	Meth Response
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	
Phase 1	0.012	1.179	0.002	1405.4	0.002	0.010	1.098



## Test Conditions

	Phase 1	Phase 2	Phase 3	Phase 4
Barometer (inHg)	28.97			
Avg Cell Temp (degF)	75.17			
Dew Point (degF)	49.43			
Specific Humidity (grains/lbm)	54.13			
NOx Corr Factor	0.9107			
CO2 Dilution Factor	14.451			
CFV Vmix (scf @68F)	3075.25			

CVS Flow Rate Avg (scfm) 241.20

Fan Placement: One Fan - Up - Front

Phase Time (secs)	765.01
Distance (miles)	10.275
Bag Analysis Time (secs)	75.0

## MFR Test Results

for Procedure 3 HWFE

MFR Number	HC	CO	NOx	CO2	NMOG	NonMeth HC
1E+07	0.0016	0.141	0.0077	134	0	0.001

Odometer  
9106 K

MPG  
66.2


MPG is 1.57 % higher than EPA MPG


MFR Lab: Volkswagen AG, Dept EASZ/1

Dyno: 21

Fuel: 61 Tier 2 Cert Gasoline

CERT

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0257-013				Vehicle ID: 361 730 136/13			
	Test Date: 9/26/2012			MFR Name: VOLKSWAGEN			
	Key Start: 10:38:19			MFR Codes: 590 VWX			
	Fuel Container ID: F00023			Config #: 00			
	Fuel Type: 61 Tier 2 Cert Test Fuel			Transmission: AUTO			
	Test Procedure: 89 us062bag (us06warmup_2bagus06)			Shift Schedule: A09980041			
	Calculation Method: Gasoline			Beginning Odometer: 009533.0 KM			
Pretest Remarks: odo in kilometers				Drive Schedule: us06warmup_2bagus06			
<b>Bag Data</b>							
	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NonMeth HC</u>	
	(ppmC)	(ppm)	(ppm)	(%)	(ppm)	(ppmC)	
<b>Phase 1</b>							
Sample	3.340	20.247	1.838	0.886	2.122		
Ambient	2.946	0.512	0.006	0.046	2.084		
Net Concentration	0.589	19.769	1.832	0.842	0.175	0.396	
Remarks:							
<b>Phase 2</b>							
Sample	3.599	76.308	0.503	0.983	2.257		
Ambient	2.875	0.561	0.015	0.046	2.086		
Net Concentration	0.936	75.788	0.488	0.940	0.325	0.579	
Remarks:							
<b>Phase 3</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Phase 4</b>							
Sample							
Ambient							
Net Concentration							
Remarks:							
<b>Results</b>	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC / NMOG</u>	<u>Vol MPG</u>
	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(gpm)	(mpg)
Phase 1	0.008	0.543	0.075	363.9	0.003	0.005 / 0.006	24.530
Phase 2	0.006	0.914	0.009	178.1	0.002	0.003 / 0.004	49.844
(NMOG=1.04xNMHC)							
Composite	0.00613	0.83125	0.02364	219.496	0.00236	0.0039 / 0.0040	
<b>Fuel Economy</b>	<u>Gasoline MPG</u>	<u>Dyno Settings</u>					<u>Dyno #:</u> D002
Phase 1	24.47						Inertia: 3625
Phase 2	49.73						EPA Set Co A: 7.3499999
		<u>1% SOC Limit</u>	<u>Act SOC A-hr</u>	<u>Sys Nom Volts</u>	<u>Charge State</u>	EPA Set Co B: 0.0141	
		0.3026	-0.1143	220.0	Pass	EPA Set Co C: 0.01545	
Composite	40.52						Emiss-Bench: D002
v120518 - d002 EPAVDAEm120926101444 Page 1 of 2 PRINTED BY: EPA/VA/CLM/ALD/SP/11/11 Print Time 26-Sep-2012 15:29							

NVFEL Laboratory Test Data							CVS
Final Laboratory Test Results- Refer to VERIFY Reports for Official Data							
Test Number: 2012-0257-013				Vehicle ID: 361 730 136/13			
<b>Results</b> 	<u>HC-FID</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>CH4</u>	<u>NMHC</u>	<u>Meth Response</u>
	(grams)	(grams)	(grams)	(grams)	(grams)	(grams)	1.098
Phase 1	0.014	0.974	0.135	652.3	0.005	0.010	
Phase 2	0.035	5.708	0.055	1112.3	0.014	0.022	
<b>Test Conditions</b>		<u>Phase 1</u>	<u>Phase 2</u>	<u>Phase 3</u>	<u>Phase 4</u>		
Barometer (inHg)		28.99	28.99				
Avg Cell Temp (degF)		74.88	75.49				
Dew Point (degF)		49.33	49.43				
Specific Humidity (grains/lbm)		53.90	54.11				
NOx Corr Factor		0.9098	0.9106				
CO2 Dilution Factor		15.090	13.526				
CFV Vmix (scf @68F)		1494.68	2284.53				
CVS Flow Rate Avg (scfm)		376.34	375.54				
Fan Placement: USO6 Only - One Large Fan - Up - Front							
Phase Time (secs)		130.10	365.00	108.20			
Distance (miles)		1.793	6.247				
Bag Analysis Time (secs)		79.7	265.0				
<b>MFR Test Results</b>		for Procedure 90 US06					
<u>MFR Number</u>	<u>HC</u>	<u>CO</u>	<u>NOx</u>	<u>CO2</u>	<u>NMOG</u>	<u>NonMeth HC</u>	
1E+07	0.0015	0.009	0.034	201	0	0.0007	
<u>Odometer</u>	<u>MPG</u>	PM		MFR Lab: Volkswagen AG, Dept EASZ/1  Dyno: 21 Fuel: 61 Tier 2 Cert Gasoline			
9143 K	44.2	0.002					
MPG is 9.09 % higher than EPA MPG							

**To:** "Giles, Michael (EEO)" [michael.giles@vw.com]; N=Vincent Mazaitis/OU=AA/O=USEPA/C=US@EPA[]  
**Cc:** "Rhodes, Brian (EEO)" [Brian.Rhodes@vw.com]; Peter, Juergen (EASZ/1)" [juergen.peter@volkswagen.de]; Thomas, Richard (EEO)" [Richard.Thomas@vw.com]; Rodgers, William (EEO)" [William.Rodgers@vw.com]  
**Bcc:** []  
**From:** CN=Jim Snyder/OU=AA/O=USEPA/C=US  
**Sent:** Mon 10/15/2012 9:03:34 PM  
**Subject:** RE: VW Group - Jetta Hybrid Release requested  
[Snyder.Jim@epamail.epa.gov](mailto:Snyder.Jim@epamail.epa.gov)  
[Wright.DavidA@epamail.epa.gov](mailto:Wright.DavidA@epamail.epa.gov)  
[Mazaitis.Vincent@epamail.epa.gov](mailto:Mazaitis.Vincent@epamail.epa.gov)  
[Richard.Thomas@vw.com](mailto:Richard.Thomas@vw.com)

Mike, I signed off the vehicle and told Ben Haynes that VW is planning to pick it up tomorrow.

Jim Snyder  
Light-Duty Vehicle Group  
Compliance Division  
United States Environmental Protection Agency  
(734) 214-4946  
[snyder.jim@epa.gov](mailto:snyder.jim@epa.gov)

From: "Giles, Michael (EEO)" <michael.giles@vw.com>  
To: "Rhodes, Brian (EEO)" <Brian.Rhodes@vw.com>  
Cc: "Thomas, Richard (EEO)" <Richard.Thomas@vw.com>, "Rodgers, William (EEO)" <William.Rodgers@vw.com>, Jim Snyder/AA/USEPA/US@EPA, "Peter, Juergen (EASZ/1)" <juergen.peter@volkswagen.de>  
Date: 10/15/2012 03:49 PM  
Subject: RE: VW Group - Jetta Hybrid Release requested

Hello Brian,

I talked to Jim Snyder and he is in the process of releasing the Jetta Hybrid. As we discussed, please pick it up tomorrow.

Hello Juergen:  
I will send you the connector from the vehicle tomorrow by Fedex. Please let me know if you need 24 hour delivery.

Regards,  
Mike

From: Giles, Michael (EEO)  
Sent: Monday, October 15, 2012 1:03 PM  
To: Rhodes, Brian (EEO)  
Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com)  
Subject: FW: VW Group - HJetta Hybrid Release requested

Brian –

We will let you know when we get the ok.

From: Giles, Michael (EEO)  
Sent: Monday, October 15, 2012 1:02 PM  
To: Jim Snyder (Snyder.Jim@epamail.epa.gov); DavidA Wright (Wright.DavidA@epamail.epa.gov); Vincent Mazaitis (Mazaitis.Vincent@epamail.epa.gov)  
Cc: Thomas, Richard (EEO) (Richard.Thomas@vw.com)  
Subject: VW Group - HJetta Hybrid Release requested

Hello Jim, David and Vince,

Just to follow up on voice messages that Richard and I have left - We are requesting that the Jetta Hybrid be released.

We would like to try and pick it up this afternoon if possible. Please let us know the outcome at your earliest convenience.

Thanks,  
Mike  
Michael Giles  
Certification Specialist  
Engineering and Environmental Office  
Volkswagen Group of America, Inc.  
3800 Hamlin Road  
Auburn Hills, MI 48326  
United States of America  
Phone +1-248-754-4229  
FAX +1-248-754-4207